

Court's Ex. **123**
Case # 37-2017-00010073-CU-BC-CTL
Rec'd _____
Dept. **C-73** Clk. _____

WATER QUALITY STUDY BMP REPORT

For

***Federal Blvd. MMCC
Conditional Use Permit***

*6176 Federal Blvd.
San Diego, CA, 92114
Portion of Block 25, Tract No. 2 of
Encanto Heights, Map No. 1100
City of San Diego
PTS No. 520606*

Applicant/Developer:

*Rebecca Berry
5982 Gullstrand Street
San Diego, CA 92122
Contact: Abhay Schweitzer
(619) 940-5814*

***Snipes-Dye Associates
civil engineers and land surveyors***

*8348 Center Drive, Suite G
La Mesa, CA 91942-2910
(619) 697-9234, Fax (619) 460-2033
EO0571*

Dated: June 4, 2018

DECLARATION OF RESPONSIBLE CHARGE

I, HEREBY DECLARE THAT I AM THE CIVIL ENGINEER OF WORK FOR THIS PROJECT, THAT I HAVE EXERCISED RESPONSIBLE CHARGE OVER THE DESIGN OF THE PROJECT AS DEFINED IN SECTION 6703 OF THE BUSINESS AND PROFESSIONS CODE, AND THAT THE DESIGN IS CONSISTENT WITH CURRENT STANDARDS.

I UNDERSTAND THAT THE CHECK OF PROJECT DRAWINGS AND SPECIFICATIONS BY THE CITY OF SAN DIEGO IS CONFINED TO A REVIEW ONLY AND DOES NOT RELIEVE ME, AS ENGINEER OF WORK, OF MY RESPONSIBILITY FOR PROJECT DESIGN.



SON P. NGUYEN
R.C.E. 86249
EXP. 03-31-19

6/7/18
DATE



City of San Diego
2016 STORM WATER STANDARDS
WATER QUALITY STUDY BMP REPORT

Son P. Nguyen
June 4, 2018

Prepare a report to identify the required permanent best management practices for Standard Development Project per the City of San Diego's Storm Water Standards.

The City's Storm Water Standards are available online at:

<http://www.sandiego.gov/stormwater/pdf/citysdstormwaterstandardsmanualdraft2015.pdf>

Your report will identify the 6 Source Control BMP's and 8 Site Design BMP's possible for your project. Your report will discuss which of the 14 applies to your project and also discuss why the remaining BMP's are not feasible or applicable to your project.

Required Permanent Best Management Practices for Standard Development Projects

Source Control (SC) BMP Requirements:

How to comply: Projects shall comply with this requirement by implementing source control BMPs listed in this section that are applicable to their project. Applicability shall be determined through consideration of the development project's features and anticipated pollutant sources. Appendix E provides guidance for identifying source control BMPs applicable to a project. The "Source Control BMP Checklist for All Development Projects" located in Appendix I-4 shall be used to document compliance with source control BMP requirements.

SC-1: Prevent illicit discharges into the MS4

An illicit discharge is any discharge to the MS4 that is not composed entirely of storm water except discharges pursuant to a National Pollutant Discharge Elimination System permit and discharges resulting from firefighting activities. Projects must effectively eliminate discharges of non-storm water into the MS4. This may involve a suite of housekeeping BMPs which could include effective irrigation, dispersion of non-storm water discharges into landscaping for infiltration, and controlling wash water from vehicle washing.

DISCUSSION:

The proposed development at 6176 Federal Blvd. will prevent non-storm water discharges into the MS4 through the following housekeeping BMPs:

1. The site shall be inspected regularly for illicit connections and discharges. If observed, action shall be taken as soon as possible to halt the connection/discharge.
2. Overspray and overwatering of vegetation for erosion control and landscaping shall be avoided.
3. Water line breaks shall be repaired as soon as possible.
4. Vehicle and equipment cleaning shall be performed off-site when possible or otherwise in a location where wash water will drain to the sanitary sewer.

SC-2: Identify the storm drain system using stenciling or signage

Storm drain signs and stencils are visible source controls typically placed adjacent to the inlets. Posting notices regarding discharge prohibitions at storm drain inlets can prevent waste dumping. Stenciling shall be provided for all storm water conveyance system inlets and catch basins within the project area. Inlet stenciling may include concrete stamping, concrete painting, placards, or other methods approved by the local municipality. In addition to storm drain stenciling, projects are encouraged to post signs and prohibitive language (with graphical icons) which prohibit illegal dumping at trailheads, parks, building entrances and public access points along channels and creeks within the project area.

Language associated with the stamping (e.g., "No Dumping-Drains to Ocean") must be satisfactory to the City Engineer. Stamping may also be required in Spanish.

DISCUSSION:

Not Applicable. There are no existing or proposed storm drains within or adjacent to the 6176 Federal Blvd. project.

SC-3: Protect outdoor material storage areas from rainfall, run-on, runoff, and wind dispersal

Materials with the potential to pollute storm water runoff shall be stored in a manner that prevents contact with rainfall and storm water runoff. Contaminated runoff shall be managed for treatment incorporate the following structural or pollutant control BMPs for outdoor material storage areas, as applicable and feasible:

Materials with the potential to contaminate storm water shall be:

- Placed in an enclosure such as, but not limited to, a cabinet, or similar structure, or under a roof or awning that prevents contact with rainfall runoff or spillage to the storm water conveyance system; or
 - Protected by secondary containment structures such as berms, dikes, or curbs.
 - The storage areas shall be paved and sufficiently impervious to contain leaks and spills, where necessary.
- (continued below)
- The storage area shall be sloped towards a sump or another equivalent measure that is effective to contain spills.
 - Runoff from downspouts/roofs shall be directed away from storage areas.
 - The storage area shall have a roof or awning that extends beyond the storage area to minimize collection of storm water within the secondary containment area. A manufactured storage shed may be used for small containers.

DISCUSSION:

Not Applicable. The proposed development at 6176 Federal Blvd. does not propose any outdoor material storage areas.

SC-4: Protect materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal

Outdoor work areas have an elevated potential for pollutant loading and spills. All development projects shall include the following structural or pollutant control BMPs for any outdoor work areas with potential for pollutant generation, as applicable and feasible:

- Create an impermeable surface such as concrete or asphalt, or a prefabricated metal drip pan, depending on the size needed to protect the materials.
- Cover the area with a roof or other acceptable cover.
- Berm the perimeter of the area to prevent water from adjacent areas from flowing on to the surface of the work area.

- Directly connect runoff to sanitary sewer or other specialized containment system(s), as needed and where feasible. This allows the more highly concentrated pollutants from these areas to receive special treatment that removes particular constituents. Approval for this connection must be obtained from the appropriate sanitary sewer agency.
- Locate the work area away from storm drains or catch basins.

DISCUSSION:

Not Applicable. The proposed development at 6176 Federal Blvd. does not propose any outdoor work areas.

SC-5: Protect trash storage areas from rainfall, run-on, runoff, and wind dispersal

Storm water runoff from areas where trash is stored or disposed of can be polluted. In addition, loose trash and debris can be easily transported by water or wind into nearby storm drain inlets, channels, and/or creeks. All development projects shall include the following structural or pollutant control BMPs, as applicable:

- Design trash container areas so that drainage from adjoining roofs and pavement is diverted around the area(s) to avoid run-on. This can include berming or grading the waste handling area to prevent run-on of storm water.
- Ensure trash container areas are screened or walled to prevent offsite transport of trash.
- Provide roofs, awnings, or attached lids on all trash containers to minimize direct precipitation and prevent rainfall from entering containers.
- Locate storm drains away from immediate vicinity of the trash storage area and vice versa.
- Post signs on all dumpsters informing users that hazardous material are not to be disposed.

DISCUSSION:

The proposed development at 6176 Federal Blvd. will protect trash storage areas from rainfall, run-on, and wind dispersal through the following:

1. All trash containers shall have attached lids and shall be placed under roofs or awnings to minimize direct precipitation and prevent rainfall from entering containers.
2. All trash containers shall be located away from storm water conveyance systems (i.e. street gutters).

SC-6: Use any additional BMPs determined to be necessary by the Copermittee to minimize pollutant generation at each project site

Appendix E.1 provides guidance on permanent controls and operational BMPs that are applicable at a project site based on potential sources of runoff pollutants at the project site. The project shall implement all applicable and feasible source control BMPs listed in Appendix E.1. In addition to the source control BMPs in Appendix E.1, additional source control requirements apply for the following project types within the City jurisdiction. Guidance for implementing these additional source control requirements are presented in Appendix E.

- **SC-6A: Large Trash Generating Facilities:** Includes but are not limited to restaurants, supermarkets, “big box” retail stores serving food, and pet stores. Refer to Appendix E.20
- **SC-6B: Animal Facilities:** Includes but are not limited to animal shelters, dog daycare centers, veterinary clinics, groomers, pet care stores, and breeding, boarding, and training facilities. Refer to Appendix E.21

• **SC-6C: Plant Nurseries and Garden Centers:** Includes but are not limited to commercial facilities that grow, distribute, sell, or store plants and plant material. Refer to Appendix E.22

• **SC-6D: Automotive-related Uses:** include but are not limited to facilities that perform maintenance or repair of vehicles, vehicle washing facilities, and retail gasoline outlets. Refer to Appendix F.23

DISCUSSION:

The proposed development at 6176 Federal Blvd. will use the following additional BMPs to minimize pollutant generation:

1. Future indoor and structural pest control. Integrated Pest Management (IPM) information shall be provided to owners or lessees.
2. Landscape/outdoor pesticide use. Owners or lessees shall maintain landscaping using minimal or no pesticides. IPM information shall be provided to owners or lessees.
3. Fire sprinkler test water shall plumbed to the sanitary sewer.
4. Miscellaneous drain or wash water. Boiler drain lines shall be directly or indirectly connected to the sanitary sewer. Condensate drain lines may discharge to landscaped areas if the flow is small enough that runoff will not occur. Roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff shall be avoided.

Site Design (SD) BMP Requirements:

How to comply: Projects shall comply with this requirement by using all of the site design BMPs listed in this section that are applicable and practicable to their project type and site conditions. Applicability of a given site design BMP shall be determined based on project type, soil conditions, presence of natural features (e.g. streams), and presence of site features (e.g. parking areas). Explanation shall be provided by the applicant when a certain site design BMP is considered to be not applicable or not practicable/feasible. Site plans shall show site design BMPs and provide adequate details necessary for effective implementation of site design BMPs. The "Site Design BMP Checklist for All Development Projects" located in Appendix I-5 shall be used to document compliance with site design BMP requirements.

SD-1: Maintain natural drainage pathways and hydrologic features

Maintain or restore natural storage reservoirs and drainage corridors (including topographic depressions, areas of permeable soils, natural swales, and ephemeral and intermittent streams)

Buffer zones for natural water bodies (where buffer zones are technically infeasible, require project applicant to include other buffers such as trees, access restrictions, etc.)

During the site assessment, natural drainages must be identified along with their connection to creeks and/or streams, if any. Natural drainages offer a benefit to storm water management as the soils and habitat already function as a natural filtering/infiltrating swale. When determining the development footprint of the site, altering natural drainages should be avoided. By providing a development envelope set back from natural drainages, the drainage can retain some water quality benefits to the watershed. In some situations, site constraints, regulations, economics, or other factors may not allow avoidance of drainages and sensitive areas. Projects proposing to dredge or fill materials in Waters of the U.S. must obtain Clean Water Act Section 401 Water Quality Certification. Projects proposing to dredge or fill waters of the State must obtain waste discharge requirements. Both the 401 Certification and the Waste Discharge Requirements are administered by the San Diego Water Board. The project applicant shall consult the local jurisdiction for other specific requirements.

Projects can incorporate SD-1 into a project by implementing the following planning and design phase techniques as applicable and practicable:

- Evaluate surface drainage and topography in considering selection of Site Design BMPs that will be most beneficial for a given project site. Where feasible, maintain topographic depressions for infiltration.
- Optimize the site layout and reduce the need for grading. Where possible, conform the site layout along natural landforms, avoid grading and disturbance of vegetation and soils, and replicate the site's natural drainage patterns. Integrating existing drainage patterns into the site plan will help maintain the site's predevelopment hydrologic function.
- Preserve existing drainage paths and depressions, where feasible and applicable, to help
- Structural BMPs cannot be located in buffer zones if a State and/or Federal resource agency (e.g. SDRWQCB, California Department of Fish and Wildlife; U.S. Army Corps of Engineers, etc.) prohibits maintenance or activity in the area.

DISCUSSION:

The proposed development at 6176 Federal Blvd. will maintain grading at a minimum but does not have any existing natural areas or hydrologic features to preserve.

SD-2: Conserve natural areas, soils and vegetation

• Conserve natural areas within the project footprint including existing trees, other vegetation, and soils

To enhance a site's ability to support source control and reduce runoff, the conservation and restoration of natural areas must be considered in the site design process. By conserving or restoring the natural drainage features, natural processes are able to intercept storm water, thereby reducing the amount of runoff. The upper soil layers of a natural area contain organic material, soil biota, vegetation, and a configuration favorable for storing and slowly conveying storm water and establishing or restoring vegetation to stabilize the site after construction. The canopy of existing native trees and shrubs also provide a water conservation benefit by intercepting rain water before it hits the ground. By minimizing disturbances in these areas, natural processes are able to intercept storm water, providing a water quality benefit. By keeping the development concentrated to the least environmentally sensitive areas of the site and set back from natural areas, storm water runoff is reduced, water quality can be improved, environmental impacts can be decreased, and many of the site's most attractive native landscape features can be retained. In some situations, site constraints, regulations, economics, and/or other factors may not allow avoidance of all sensitive areas on a project site. Project applicant shall consult the local municipality for jurisdictional specific requirements for mitigation of removal of sensitive areas.

Projects can incorporate SD-2 by implementing the following planning and design phase techniques as applicable and practicable:

- Identify areas most suitable for development and areas that should be left undisturbed. Additionally, reduced disturbance can be accomplished by increasing building density and increasing height, if possible.
- Cluster development on least-sensitive portions of a site while leaving the remaining land in a natural undisturbed condition.
- Avoid areas with thick, undisturbed vegetation. Soils in these areas have a much higher capacity to store and infiltrate runoff than disturbed soils, and reestablishment of a mature vegetative community can take decades. Vegetative cover can also provide additional volume storage of rainfall by retaining water on the surfaces of leaves, branches, and trunks of trees during and after storm events.
- Preserve trees, especially native trees and shrubs, and identify locations for planting additional native or drought tolerant trees and large shrubs.
- In areas of disturbance, topsoil should be removed before construction and replaced after the project is completed. When handled carefully, such an approach limits the disturbance to native soils and reduces the need for additional (purchased) topsoil during later phases.

- Avoid sensitive areas, such as wetlands, biological open space areas, biological mitigation sites, streams, floodplains, or particular vegetation communities, such as coastal sage scrub and intact forest. Also, avoid areas that are habitat for sensitive plants and animals, particularly those, State or federally listed as endangered, threatened or rare. Development in these areas is often restricted by federal, state and local laws.

DISCUSSION:

The proposed development at 6176 Federal Blvd. does not have any natural areas, soils, and vegetation to preserve.

SD-3: Minimize impervious area

- **Construct streets, sidewalks or parking lots aisles to the minimum widths necessary, provided public safety is not compromised**
- **Minimize the impervious footprint of the project**

One of the principal causes of environmental impacts by development is the creation of impervious surfaces. Imperviousness links urban land development to degradation of aquatic ecosystems in two ways:

- First, the combination of paved surfaces and piped runoff efficiently collects urban pollutants and transports them, in suspended or dissolved form, to surface waters. These pollutants may originate as airborne dust, be washed from the atmosphere during rains, or may be generated by automobiles and outdoor work activities.
- Second, increased peak flows and runoff durations typically cause erosion of stream banks and beds, transport of fine sediments, and disruption of aquatic habitat. Measures taken to control stream erosion, such as hardening banks with riprap or concrete, may permanently eliminate habitat. Impervious cover can be minimized through identification of the smallest possible land area that can be practically impacted or disturbed during site development. Reducing impervious surfaces retains the permeability of the project site, allowing natural processes to filter and reduce sources of pollution.

Projects can incorporate SD-3 by implementing the following planning and design phase techniques as applicable and practicable:

- Decrease building footprint through (the design of compact and taller structures when allowed by local zoning and design standards and provided public safety is not compromised.
- Construct walkways, trails, patios, overflow parking lots, alleys and other low-traffic areas with permeable surfaces.
- Construct streets, sidewalks and parking lot aisles to the minimum widths necessary, provided that public safety and alternative transportation (e.g. pedestrians, bikes) are not compromised.
- Consider the implementation of shared parking lots and driveways where possible.
- Landscaped area in the center of a cul-de-sac can reduce impervious area depending on configuration. Design of a landscaped cul-de-sac must be coordinated with fire department personnel to accommodate turning radii and other operational needs.
- Design smaller parking lots with fewer stalls, smaller stalls, more efficient lanes.
- Design indoor or underground parking.
- Minimize the use of impervious surfaces in the landscape design.

DISCUSSION:

The proposed development at 6176 Federal Blvd. will minimize impervious areas by incorporating the following:

1. Building footprint will be minimized through the use of taller structures.
2. Sidewalks will be constructed to the minimum widths necessary.
3. A portion of the proposed parking spaces will be constructed with permeable pavement per INF-3 as shown in Appendix E of the City of San Diego Storm Water Standards (January 2018 Edition).
4. The use of impervious surfaces in the landscape design will be minimized.

SD-4: Minimize soil compaction

• Minimize soil compaction in landscaped areas

The upper soil layers contain organic material, soil biota, and a configuration favorable for storing and slowly conveying storm water down gradient. By protecting native soils and vegetation in appropriate areas during the clearing and grading phase of development the site can retain some of its existing beneficial hydrologic function. Soil compaction resulting from the movement of heavy construction equipment can reduce soil infiltration rates. It is important to recognize that areas adjacent to and under building foundations, roads and manufactured slopes must be compacted with minimum soil density requirements in compliance with local building and grading ordinances.

Projects can incorporate SD-4 by implementing the following planning and design phase techniques as applicable and practicable:

- Avoid disturbance in planned green space and proposed landscaped areas where feasible. These areas that are planned for retaining their beneficial hydrological function should be protected during the grading/construction phase so that vehicles and construction equipment do not intrude and inadvertently compact the area.
- In areas planned for landscaping where compaction could not be avoided, re-till the soil surface to allow for better infiltration capacity. Soil amendments are recommended and may be necessary to increase permeability and organic content. Soil stability, density requirements, and other geotechnical considerations associated with soil compaction must be reviewed by a qualified landscape architect or licensed geotechnical, civil or other professional engineer.

DISCUSSION:

The proposed development at 6176 Federal Blvd. will minimize soil compaction by incorporating the following:

1. For new landscaped areas, soil surfaces will be re-tilled and soil amendments will be utilized as recommended per landscape architect.

SD-5: Disperse impervious areas

Disconnect impervious surfaces through disturbed pervious areas

Design and construct landscaped or other pervious areas to effectively receive and infiltrate, retain and/or treat runoff from impervious areas prior to discharging to the MS4

Impervious area dispersion (dispersion) refers to the practice of essentially disconnecting impervious areas from directly draining to the storm drain system by routing runoff from impervious areas such as rooftops, walkways, and driveways onto the surface of adjacent pervious areas. The intent is to slow runoff discharges, and reduce

volumes while achieving incidental treatment. Volume reduction from dispersion is dependent on the infiltration characteristics of the pervious area and the amount of impervious area draining to the pervious area. Treatment is achieved through filtration, shallow sedimentation, sorption, infiltration, evapotranspiration, biochemical processes and plant uptake.

The effects of imperviousness can be mitigated by disconnecting impervious areas from the drainage system and by encouraging detention and retention of runoff near the point where it is generated. Detention and retention of runoff reduces peak flows and volumes and allows pollutants to settle out or adhere to soils before they can be transported downstream. Disconnection practices may be applied in almost any location, but impervious surfaces must discharge into a suitable receiving area for the practices to be effective. Information gathered during the site assessment will help determine appropriate receiving areas.

Project designs should direct runoff from impervious areas to adjacent landscaping areas that have higher potential for infiltration and surface water storage. This will limit the amount of runoff generated, and therefore the size of the mitigation BMPs downstream. The design, including consideration of slopes and soils, must reflect a reasonable expectation that runoff will soak into the soil and produce no runoff of the DCV. On hillside sites, drainage from upper areas may be collected in conventional catch basins and piped to landscaped areas that have higher potential for infiltration. Or use low retaining walls to create terraces that can accommodate BMPs.

Projects can incorporate SD-5 by implementing the following planning and design phase techniques as applicable and practicable:

- Implement design criteria and considerations listed in impervious area dispersion fact sheet (SD-5) presented in Appendix E.
- Drain rooftops into adjacent landscape areas.
- Drain impervious parking lots, sidewalks, walkways, trails, and patios into adjacent landscape areas.
- Reduce or eliminate curb and gutters from roadway sections, thus allowing roadway runoff to drain to adjacent pervious areas.
- Replace curbs and gutters with roadside vegetated swales and direct runoff from the paved street or parking areas to adjacent LID facilities. Such an approach for alternative design can reduce the overall capital cost of the site development while improving the storm water quantity and quality issues and the site's aesthetics.
- Plan site layout and grading to allow for runoff from impervious surfaces to be directed into distributed permeable areas such as turf, landscaped or permeable recreational areas, medians, parking islands, planter boxes, etc.
- Detain and retain runoff throughout the site. On flatter sites, landscaped areas can be interspersed among the buildings and pavement areas. On hillside sites, drainage from upper areas may be collected in conventional catch basins and conveyed to landscaped areas in lower areas of the site.
- Pervious area that receives run on from impervious surfaces shall have a minimum width of 10 feet and a maximum slope of 5%.

DISCUSSION:

The proposed development at 6176 Federal Blvd. will disperse impervious areas by incorporating the following:

1. Implementing design criteria and considerations listed in impervious area dispersion fact sheet (SD-5) presented in Appendix E of the City of San Diego Storm Water Standards (January 2018 Edition).

SD-6: Collect runoff

- Use small collection strategies located at, or as close to as possible to the sources (i.e. the point where storm water initially meets the ground) to minimize the transport of runoff and pollutants to the MS4 and receiving waters
- Use permeable material for projects with low traffic areas and appropriate soil conditions

Distributed control of storm water runoff from the site can be accomplished by applying small collection techniques (e.g. green roofs), or integrated management practices, on small sub-catchments or on residential lots. Small collection techniques foster opportunities to maintain the natural hydrology provide a much greater range of control practices. Integration of storm water management into landscape design and natural features of the site, reduce site development and long-term maintenance costs, and provide redundancy if one technique fails. On flatter sites, it typically works best to intersperse landscaped areas and integrate small scale retention practices among the buildings and paving.

Permeable pavements contain small voids that allow water to pass through to a gravel base. They come in a variety of forms; they may be a modular paving system (concrete pavers, grass-pave, or gravel-pave) or poured in place pavement (porous concrete, permeable asphalt). Project applicants should identify locations where permeable pavements could be substituted for impervious concrete or asphalt paving. The O&M of the site must ensure that permeable pavements will not be sealed in the future. In areas where infiltration is not appropriate, permeable paving systems can be fitted with an under drain to allow filtration, storage, and evaporation, prior to drainage into the storm drain system.

Projects can incorporate SD-6 by implementing the following planning and design phase techniques as applicable and practicable:

- Implementing distributed small collection techniques to collect and retain runoff
- Installing permeable pavements (see SD-6B in Appendix E)

DISCUSSION:

The proposed development at 6176 Federal Blvd. will collect some runoff by implementing the following:

1. Constructing a portion of the proposed parking spaces with permeable pavement per INF-3 as shown in Appendix E of the City of San Diego Storm Water Standards (January 2018 Edition).

SD-7: Landscape with native or drought tolerant species

All development projects are required to select a landscape design and plant palette that minimizes required resources (irrigation, fertilizers and pesticides) and pollutants generated from landscape areas. Native plants require less fertilizers and pesticides because they are already adapted to the rainfall patterns and soils conditions. Plants should be selected to be drought tolerant and not require watering after establishment (2 to 3 years). Watering should only be required during prolonged dry periods after plants are established. Final selection of plant material needs to be made by a landscape architect experienced with LID techniques. Microclimates vary significantly throughout the region and consulting local municipal resources will help to select plant material suitable for a specific geographic location.

Projects can incorporate SD-7 by landscaping with native and drought tolerant species. Recommended plant list is included in Appendix E (Fact Sheet PL).

DISCUSSION:

The proposed development at 6176 Federal Blvd. will incorporate SD-7 by landscaping with native and drought tolerant species in the proposed landscaped areas as recommended per the landscaping plans.

SD-8: Harvest and use precipitation

Harvest and use BMPs capture and stores storm water runoff for later use. Harvest and use can be applied at smaller scales (Standard Projects) using rain barrels or at larger scales (PDPs) using cisterns. This harvest and use

technique has been successful in reducing runoff discharged to the storm drain system conserving potable water and recharging groundwater.

Rain barrels are above ground storage vessels that capture runoff from roof downspouts during rain events and detain that runoff for later reuse for irrigating landscaped areas. The temporary storage of roof runoff reduces the runoff volume from a property and may reduce the peak runoff velocity for small, frequently occurring storms. In addition, by reducing the amount of storm water runoff that flows overland into a storm water conveyance system (storm drain inlets and drain pipes), less pollutants are transported through the conveyance system into local creeks and the ocean. The reuse of the detained water for irrigation purposes leads to the conservation of potable water and the recharge of groundwater. SD-8 fact sheet in Appendix E provides additional detail for designing Harvest and Use BMPs. Projects can incorporate SD-8 by installing rain barrels or cisterns, as applicable.

DISCUSSION:

Not Applicable. The proposed development at 6176 Federal Blvd. does not propose any harvest and use precipitation BMPs.

ATTACHMENT A
STORM WATER REQUIREMENTS
APPLICABILITY CHECKLIST (DS-560)



City of San Diego
Development Services
1222 First Ave., MS-302
San Diego, CA 92101
(619) 446-5000

Storm Water Requirements Applicability Checklist

FORM
DS-560
OCTOBER 2016

Project Address: **6176 Federal Blvd., San Diego, CA 92114**

Project Number (for City Use Only):

SECTION 1. Construction Storm Water BMP Requirements:

All construction sites are required to implement construction BMPs in accordance with the performance standards in the [Storm Water Standards Manual](#). Some sites are additionally required to obtain coverage under the State Construction General Permit (CGP)¹, which is administered by the State Water Resources Control Board.

For all projects complete PART A: If project is required to submit a SWPPP or WPCP, continue to PART B.

PART A: Determine Construction Phase Storm Water Requirements.

1. Is the project subject to California's statewide General NPDES permit for Storm Water Discharges Associated with Construction Activities, also known as the State Construction General Permit (CGP)? (Typically projects with land disturbance greater than or equal to 1 acre.)
☐ Yes; SWPPP required, skip questions 2-4 ☒ No; next question
2. Does the project propose construction or demolition activity, including but not limited to, clearing, grading, grubbing, excavation, or any other activity resulting in ground disturbance and contact with storm water runoff?
☒ Yes; WPCP required, skip 3-4 ☐ No; next question
3. Does the project propose routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility? (Projects such as pipeline/utility replacement)
☐ Yes; WPCP required, skip 4 ☐ No; next question
4. Does the project only include the following Permit types listed below?
 - Electrical Permit, Fire Alarm Permit, Fire Sprinkler Permit, Plumbing Permit, Sign Permit, Mechanical Permit, Spa Permit.
 - Individual Right of Way Permits that exclusively include only ONE of the following activities: water service, sewer lateral, or utility service.
 - Right of Way Permits with a project footprint less than 150 linear feet that exclusively include only ONE of the following activities: curb ramp, sidewalk and driveway apron replacement, pot holing, curb and gutter replacement, and retaining wall encroachments.☐ Yes; no document required

Check one of the boxes below, and continue to PART B:

- ☐ If you checked "Yes" for question 1,
a SWPPP is REQUIRED. Continue to PART B
- ☒ If you checked "No" for question 1, and checked "Yes" for question 2 or 3,
a WPCP is REQUIRED. If the project proposes less than 5,000 square feet of ground disturbance AND has less than a 5-foot elevation change over the entire project area, a Minor WPCP may be required instead. **Continue to PART B.**
- ☐ If you checked "No" for all questions 1-3, and checked "Yes" for question 4
PART B does not apply and no document is required. Continue to Section 2.

1. More information on the City's construction BMP requirements as well as CGP requirements can be found at:
www.sandiego.gov/stormwater/regulations/index.shtml

PART B: Determine Construction Site Priority

This prioritization must be completed within this form, noted on the plans, and included in the SWPPP or WPCP. The city reserves the right to adjust the priority of projects both before and after construction. Construction projects are assigned an inspection frequency based on if the project has a "high threat to water quality." The City has aligned the local definition of "high threat to water quality" to the risk determination approach of the State Construction General Permit (CGP). The CGP determines risk level based on project specific sediment risk and receiving water risk. Additional inspection is required for projects within the Areas of Special Biological Significance (ASBS) watershed. **NOTE:** The construction priority does **NOT** change construction BMP requirements that apply to projects; rather, it determines the frequency of inspections that will be conducted by city staff.

Complete PART B and continued to Section 2

1. ☐ **ASBS**
a. Projects located in the ASBS watershed.
2. ☐ **High Priority**
a. Projects 1 acre or more determined to be Risk Level 2 or Risk Level 3 per the Construction General Permit and not located in the ASBS watershed.
b. Projects 1 acre or more determined to be LUP Type 2 or LUP Type 3 per the Construction General Permit and not located in the ASBS watershed.
3. ☐ **Medium Priority**
a. Projects 1 acre or more but not subject to an ASBS or high priority designation.
b. Projects determined to be Risk Level 1 or LUP Type 1 per the Construction General Permit and not located in the ASBS watershed.
4. ☒ **Low Priority**
a. Projects requiring a Water Pollution Control Plan but not subject to ASBS, high, or medium priority designation.

SECTION 2. Permanent Storm Water BMP Requirements.

Additional information for determining the requirements is found in the [Storm Water Standards Manual](#).

PART C: Determine if Not Subject to Permanent Storm Water Requirements.

Projects that are considered maintenance, or otherwise not categorized as "new development projects" or "redevelopment projects" according to the [Storm Water Standards Manual](#) are not subject to Permanent Storm Water BMPs.

If "yes" is checked for any number in Part C, proceed to Part F and check "Not Subject to Permanent Storm Water BMP Requirements".

If "no" is checked for all of the numbers in Part C continue to Part D.

1. Does the project only include interior remodels and/or is the project entirely within an existing enclosed structure and does not have the potential to contact storm water? ☐ Yes ☒ No
2. Does the project only include the construction of overhead or underground utilities without creating new impervious surfaces? ☐ Yes ☒ No
3. Does the project fall under routine maintenance? Examples include, but are not limited to: roof or exterior structure surface replacement, resurfacing or reconfiguring surface parking lots or existing roadways without expanding the impervious footprint, and routine replacement of damaged pavement (grinding, overlay, and pothole repair). ☐ Yes ☒ No

Clear Page 2

PART D: PDP Exempt Requirements.

PDP Exempt projects are required to implement site design and source control BMPs.

If "yes" was checked for any questions in Part D, continue to Part F and check the box labeled "PDP Exempt."

If "no" was checked for all questions in Part D, continue to Part E.

1. Does the project ONLY include new or retrofit sidewalks, bicycle lanes, or trails that:

- Are designed and constructed to direct storm water runoff to adjacent vegetated areas, or other non-erodible permeable areas? Or;
- Are designed and constructed to be hydraulically disconnected from paved streets and roads? Or;
- Are designed and constructed with permeable pavements or surfaces in accordance with the Green Streets guidance in the City's Storm Water Standards manual?

☐ Yes; PDP exempt requirements apply

☒ No; next question

2. Does the project ONLY include retrofitting or redeveloping existing paved alleys, streets or roads designed and constructed in accordance with the Green Streets guidance in the [City's Storm Water Standards Manual](#)?

☐ Yes; PDP exempt requirements apply

☒ No; project not exempt.

PART E: Determine if Project is a Priority Development Project (PDP).

Projects that match one of the definitions below are subject to additional requirements including preparation of a Storm Water Quality Management Plan (SWQMP).

If "yes" is checked for any number in PART E, continue to PART F and check the box labeled "Priority Development Project".

If "no" is checked for every number in PART E, continue to PART F and check the box labeled "Standard Development Project".

1. New Development that creates 10,000 square feet or more of impervious surfaces collectively over the project site. This includes commercial, industrial, residential, mixed-use, and public development projects on public or private land.

☐ Yes ☒ No

2. Redevelopment project that creates and/or replaces 5,000 square feet or more of impervious surfaces on an existing site of 10,000 square feet or more of impervious surfaces. This includes commercial, industrial, residential, mixed-use, and public development projects on public or private land.

☐ Yes ☒ No

3. New development or redevelopment of a restaurant. Facilities that sell prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC 5812), and where the land development creates and/or replace 5,000 square feet or more of impervious surface.

☐ Yes ☒ No

4. New development or redevelopment on a hillside. The project creates and/or replaces 5,000 square feet or more of impervious surface (collectively over the project site) and where the development will grade on any natural slope that is twenty-five percent or greater.

☐ Yes ☒ No

5. New development or redevelopment of a parking lot that creates and/or replaces 5,000 square feet or more of impervious surface (collectively over the project site).

☐ Yes ☒ No

6. New development or redevelopment of streets, roads, highways, freeways, and driveways. The project creates and/or replaces 5,000 square feet or more of impervious surface (collectively over the project site).

☐ Yes ☒ No

Clear Page 3

7. **New development or redevelopment discharging directly to an Environmentally Sensitive Area.** The project creates and/or replaces 2,500 square feet of impervious surface (collectively over project site), and discharges directly to an Environmentally Sensitive Area (ESA). "Discharging directly to" includes flow that is conveyed overland a distance of 200 feet or less from the project to the ESA, or conveyed in a pipe or open channel any distance as an isolated flow from the project to the ESA (i.e. not commingled with flows from adjacent lands). ☐ Yes ☒ No
8. **New development or redevelopment projects of a retail gasoline outlet (RGO) that create and/or replaces 5,000 square feet of impervious surface.** The development project meets the following criteria: (a) 5,000 square feet or more or (b) has a projected Average Daily Traffic (ADT) of 100 or more vehicles per day. ☐ Yes ☒ No
9. **New development or redevelopment projects of an automotive repair shops that creates and/or replaces 5,000 square feet or more of impervious surfaces.** Development projects categorized in any one of Standard Industrial Classification (SIC) codes 5013, 5014, 5541, 7532-7534, or 7536-7539. ☐ Yes ☒ No
10. **Other Pollutant Generating Project.** The project is not covered in the categories above, results in the disturbance of one or more acres of land and is expected to generate pollutants post construction, such as fertilizers and pesticides. This does not include projects creating less than 5,000 sf of impervious surface and where added landscaping does not require regular use of pesticides and fertilizers, such as slope stabilization using native plants. Calculation of the square footage of impervious surface need not include linear pathways that are for infrequent vehicle use, such as emergency maintenance access or bicycle pedestrian use, if they are built with pervious surfaces or if they sheet flow to surrounding pervious surfaces. ☐ Yes ☒ No

PART F: Select the appropriate category based on the outcomes of PART C through PART E.

1. The project is **NOT SUBJECT TO PERMANENT STORM WATER REQUIREMENTS.** ☐
2. The project is a **STANDARD DEVELOPMENT PROJECT.** Site design and source control BMP requirements apply. See the [Storm Water Standards Manual](#) for guidance. ☒
3. The project is **PDP EXEMPT.** Site design and source control BMP requirements apply. See the [Storm Water Standards Manual](#) for guidance. ☐
4. The project is a **PRIORITY DEVELOPMENT PROJECT.** Site design, source control, and structural pollutant control BMP requirements apply. See the [Storm Water Standards Manual](#) for guidance on determining if project requires a hydromodification plan management ☐

Ramón Esquer (Snipes-Dye Associates)

Design Engineer

Name of Owner or Agent (Please Print)

Title

Signature

06/04/2017

Date

ATTACHMENT B
SOURCE CONTROL &
SITE DESIGN BMP CHECKLIST

Source Control BMP Checklist for Standard Projects		Form I-4A	
<p>All development projects must implement source control BMPs. Refer to Chapter 4 and Appendix E of the BMP Design Manual for information to implement BMPs shown in this checklist.</p> <p>Note: All selected BMPs must be shown on the construction plans.</p>			
Source Control Requirement	Applied ⁽¹⁾ ?		
4.2.1 Prevention of Illicit Discharges into the MS4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.2.2 Storm Drain Stenciling or Signage	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
4.2.3 Protect Outdoor Materials Storage Areas from Rainfall, Run-On, Runoff, and Wind Dispersal	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
4.2.4 Protect Materials Stored in Outdoor Work Areas from Rainfall, Run-On, Runoff, and Wind Dispersal	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
4.2.5 Protect Trash Storage Areas from Rainfall, Run-On, Runoff, and Wind Dispersal	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.2.6 BMPs based on Potential Sources of Runoff Pollutants			
On-site storm drain inlets	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Interior floor drains and elevator shaft sump pumps	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Interior parking garages	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Need for future indoor & structural pest control	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Landscape/Outdoor Pesticide Use	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Pools, spas, ponds, decorative fountains, and other water features	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Food service	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Refuse areas	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Industrial processes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Outdoor storage of equipment or materials	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Vehicle/Equipment Repair and Maintenance	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Fuel Dispensing Areas	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Loading Docks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Fire Sprinkler Test Water	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Miscellaneous Drain or Wash Water	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Plazas, sidewalks, and parking lots	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
SC-6A: Large Trash Generating Facilities	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
SC-6B: Animal Facilities	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
SC-6C: Plant Nurseries and Garden Centers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
SC-6D: Automotive Facilities	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
<p>Discussion / justification for all "No" answers shown above:</p> <p>All features selected as "N/A" do not exist or are not being proposed at this project.</p>			

Site Design BMP Checklist for Standard Projects		Form I-5A	
<p>All development projects must implement site design BMPs. Refer to Chapter 4 and Appendix E of the BMP Design Manual for information to implement BMPs shown in this checklist.</p> <p>Note: All selected BMPs must be shown on the construction plans.</p>			
Site Design Requirement	Applied ⁽¹⁾ ?		
4.3.1 Maintain Natural Drainage Pathways and Hydrologic Features	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
4.3.2 Conserve Natural Areas, Soils, and Vegetation	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
4.3.3 Minimize Impervious Area	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.3.4 Minimize Soil Compaction	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.3.5 Impervious Area Dispersion	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.3.6 Runoff Collection	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.3.7 Landscaping with Native or Drought Tolerant Species	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4.3.8 Harvest and Use Precipitation	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
<p>Discussion / justification for all "No" answers shown above:</p> <p>All features selected as "N/A" do not exist or are not being proposed at this project.</p>			

⁽¹⁾ Answer for each source control and site design category shall be pursuant to the following:

- "Yes" means the project will implement the BMP as described in Chapter 4 and/or Appendix E of the BMP Design Manual. Discussion / justification is not required.
- "No" means the BMP is applicable to the project but it is not feasible to implement. Discussion / justification must be provided.
- "N/A" means the BMP is not applicable at the project site because the project does not include the feature that is addressed by the BMP (e.g., the project has no outdoor materials storage areas). Discussion / justification may be provided.

ATTACHMENT C
SOURCE CONTROL &
SITE DESIGN BMP PLAN

ATTACHMENT D

FACT SHEETS



Graphic by: Margie Winter

Description

Non-stormwater discharges are those flows that do not consist entirely of stormwater. For municipalities non-stormwater discharges present themselves in two situations. One is from fixed facilities owned and/or operated by the municipality. The other situation is non-stormwater discharges that are discovered during the normal operation of a field program. Some non-stormwater discharges do not include pollutants and may be discharged to the storm drain. These include uncontaminated groundwater and natural springs. There are also some non-stormwater discharges that typically do not contain pollutants and may be discharged to the storm drain with conditions. These include car washing, and surface cleaning. However, there are certain non-stormwater discharges that pose environmental concern. These discharges may originate from illegal dumping or from internal floor drains, appliances, industrial processes, sinks, and toilets that are connected to the nearby storm drainage system. These discharges (which may include: process waste waters, cooling waters, wash waters, and sanitary wastewater) can carry substances (such as paint, oil, fuel and other automotive fluids, chemicals and other pollutants) into storm drains. The ultimate goal is to effectively eliminate non-stormwater discharges to the stormwater drainage system through implementation of measures to detect, correct, and enforce against illicit connections and illegal discharges.

Approach

The municipality must address non-stormwater discharges from its fixed facilities by assessing the types of non-stormwater discharges and implementing BMPs for the discharges determined to pose environmental concern. For field programs

Objectives

- Contain
- Educate
- Reduce/Minimize

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input checked="" type="checkbox"/>
Trash	<input checked="" type="checkbox"/>
Metals	<input checked="" type="checkbox"/>
Bacteria	<input checked="" type="checkbox"/>
Oil and Grease	<input checked="" type="checkbox"/>
Organics	<input checked="" type="checkbox"/>
Oxygen Demanding	<input checked="" type="checkbox"/>



the field staff must be trained to know what to look for regarding non-stormwater discharges and the procedures to follow in investigating the detected discharges.

Suggested Protocols**Fixed Facility***General*

- Post “No Dumping” signs with a phone number for reporting dumping and disposal. Signs should also indicate fines and penalties for illegal dumping.
- Stencil storm drains, where applicable, to prevent illegal disposal of pollutants. Storm drain inlets should have messages such as “Dump No Waste Drains to Stream” stenciled next to them to warn against ignorant or intentional dumping of pollutants into the storm drainage system.
- Landscaping and beautification efforts of hot spots might also discourage future dumping, as well as provide open space and increase property values.
- Lighting or barriers may also be needed to discourage future dumping.

Illicit Connections

- Locate discharges from the fixed facility drainage system to the municipal storm drain system through review of “as-built” piping schematics.
- Use techniques such as smoke testing, dye testing and television camera inspection (as noted below) to verify physical connections.
- Isolate problem areas and plug illicit discharge points.

Visual Inspection and Inventory

- Inventory and inspect each discharge point during dry weather.
- Keep in mind that drainage from a storm event can continue for several days following the end of a storm and groundwater may infiltrate the underground stormwater collection system. Also, non-stormwater discharges are often intermittent and may require periodic inspections.

Review Infield Piping

- Review the “as-built” piping schematic as a way to determine if there are any connections to the stormwater collection system.
- Inspect the path of floor drains in older buildings.

Smoke Testing

- Smoke testing of wastewater and stormwater collection systems is used to detect connections between the two systems.

- During dry weather the stormwater collection system is filled with smoke and then traced to sources. The appearance of smoke at the base of a toilet indicates that there may be a connection between the sanitary and the stormwater system.

Dye Testing

- A dye test can be performed by simply releasing a dye into either your sanitary or process wastewater system and examining the discharge points from the stormwater collection system for discoloration.

TV Inspection of Storm Sewer

- TV Cameras can be employed to visually identify illicit connections to the fixed facility storm drain system.

Illegal Dumping

- Regularly inspect and clean up hot spots and other storm drainage areas where illegal dumping and disposal occurs.
- Clean up spills on paved surfaces with as little water as possible. Use a rag for small spills, a damp mop for general cleanup, and absorbent material for larger spills. If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.
- Never hose down or bury dry material spills. Sweep up the material and dispose of properly.
- Use adsorbent materials on small spills rather than hosing down the spill. Remove the adsorbent materials promptly and dispose of properly.
- For larger spills, a private spill cleanup company or Hazmat team may be necessary.
- See fact sheet SC-11 Spill Prevention, Control, and Clean Up.

Field Program

General

- Develop clear protocols and lines of communication for effectively prohibiting non-stormwater discharges, especially ones that involve more than one jurisdiction and those that are not classified as hazardous, which are often not responded to as effectively as they need to be.
- Stencil storm drains, where applicable, to prevent illegal disposal of pollutants. Storm drain inlets should have messages such as “Dump No Waste Drains to Stream” stenciled next to them to warn against ignorant or intentional dumping of pollutants into the storm drainage system.
- See SC-74 Stormwater Drainage System Maintenance for additional information.

Field Inspection

- Regularly inspect and clean up hot spots and other storm drainage areas where illegal dumping and disposal occurs.
- During routine field program maintenance field staff should look for evidence of illegal discharges or illicit connection:
 - Is there evidence of spills such as paints, discoloring, etc.
 - Are there any odors associated with the drainage system
 - Record locations of apparent illegal discharges/illicit connections and notify appropriate investigating agency.
- If trained, conduct field investigation of non-stormwater discharges to determine whether they pose a threat to water quality.

Recommended Complaint Investigation Equipment

- Field Screening Analysis
 - pH paper or meter
 - Commercial stormwater pollutant screening kit that can detect for reactive phosphorus, nitrate nitrogen, ammonium nitrogen, specific conductance, and turbidity
 - Sample jars
 - Sample collection pole
 - A tool to remove access hole covers
- Laboratory Analysis
 - Sample cooler
 - Ice
 - Sample jars and labels
 - Chain of custody forms.
- Documentation
 - Camera
 - Notebook
 - Pens
 - Notice of Violation forms

- Educational materials

Reporting

- A database is useful for defining and tracking the magnitude and location of the problem.
- Report prohibited non-stormwater discharges observed during the course of normal daily activities so they can be investigated, contained and cleaned up or eliminated.
- Document that non-stormwater discharges have been eliminated by recording tests performed, methods used, dates of testing, and any onsite drainage points observed.
- Maintain documentation of illicit connection and illegal dumping incidents, including significant conditionally exempt discharges that are not properly managed.

Enforcement

- Educate the responsible party if identified on the impacts of their actions, explain the stormwater requirements, and provide information regarding Best Management Practices (BMP), as appropriate. Initiate follow-up and/or enforcement procedures.
- If an illegal discharge is traced to a commercial, residential or industrial source, conduct the following activities or coordinate the following activities with the appropriate agency:
 - Contact the responsible party to discuss methods of eliminating the non-stormwater discharge, including disposal options, recycling, and possible discharge to the sanitary sewer (if within POTW limits).
 - Provide information regarding BMPs to the responsible party, where appropriate.
 - Begin enforcement procedures, if appropriate.
 - Continue inspection and follow-up activities until the illicit discharge activity has ceased.
- If an illegal discharge is traced to a commercial or industrial activity, coordinate information on the discharge with the jurisdiction's commercial and industrial facility inspection program.

Training

- Train technical staff to identify and document illegal dumping incidents.
- Well-trained employees can reduce human errors that lead to accidental releases or spills. The employee should have the tools and knowledge to immediately begin cleaning up a spill if one should occur. Employees should be familiar with the Spill Prevention Control and Countermeasure Plan.
- Train employees to identify non-stormwater discharges and report them to the appropriate departments.
- Train staff who have the authority to conduct surveillance and inspections, and write citations for those caught illegally dumping.

- Train municipal staff responsible for surveillance and inspection in the following:
 - OSHA-required Health and Safety Training (29 CFR 1910.120) plus annual refresher training (as needed).
 - OSHA Confined Space Entry training (Cal-OSHA Confined Space, Title 8 and federal OSHA 29 CFR 1910.146).
 - Procedural training (field screening, sampling, smoke/dye testing, TV inspection).
- Educate the identified responsible party on the impacts of his or her actions.

Spill Response and Prevention

- See SC-11 Spill Prevention Control and Clean Up

Other Considerations

- The elimination of illegal dumping is dependent on the availability, convenience, and cost of alternative means of disposal. The cost of fees for dumping at a proper waste disposal facility are often more than the fine for an illegal dumping offense, thereby discouraging people from complying with the law. The absence of routine or affordable pickup service for trash and recyclables in some communities also encourages illegal dumping. A lack of understanding regarding applicable laws or the inadequacy of existing laws may also contribute to the problem.
- Municipal codes should include sections prohibiting the discharge of soil, debris, refuse, hazardous wastes, and other pollutants into the storm drain system.
- Many facilities do not have accurate, up-to-date schematic drawings.
- Can be difficult to locate illicit connections especially if there is groundwater infiltration.

Requirements***Costs***

- Eliminating illicit connections can be expensive especially if structural modifications are required such re-plumbing cross connections under an existing slab.
- Minor cost to train field crews regarding the identification of non-stormwater discharges. The primary cost is for a fully integrated program to identify and eliminate illicit connections and illegal dumping. However, by combining with other municipal programs (i.e. pretreatment program) cost may be lowered.
- Municipal cost for containment and disposal may be borne by the discharger.

Maintenance

Not applicable

Supplemental Information

Further Detail of the BMP

What constitutes a “non-stormwater” discharge?

- Non-stormwater discharges are discharges not made up entirely of stormwater and include water used directly in the manufacturing process (process wastewater), air conditioning condensate and coolant, non-contact cooling water, cooling equipment condensate, outdoor secondary containment water, vehicle and equipment wash water, landscape irrigation, sink and drinking fountain wastewater, sanitary wastes, or other wastewaters.

Permit Requirements

- Current municipal NPDES permits require municipalities to effectively prohibit non-stormwater discharges unless authorized by a separate NPDES permit or allowed in accordance with the current NPDES permit conditions. Typically the current permits allow certain non-stormwater discharges in the storm drain system as long as the discharges are not significant sources of pollutants. In this context the following non-stormwater discharges are typically allowed:
 - Diverted stream flows;
 - Rising found waters;
 - Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20));
 - Uncontaminated pumped ground water;
 - Foundation drains;
 - Springs;
 - Water from crawl space pumps;
 - Footing drains;
 - Air conditioning condensation;
 - Flows from riparian habitats and wetlands;
 - Water line and hydrant flushing ;
 - Landscape irrigation;
 - Planned and unplanned discharges from potable water sources;
 - Irrigation water;
 - Individual residential car washing; and
 - Lawn watering.

Municipal facilities subject to industrial general permit requirements must include a certification that the stormwater collection system has been tested or evaluated for the presence of non-stormwater discharges. The state's General Industrial Stormwater Permit requires that non-stormwater discharges be eliminated prior to implementation of the facility's SWPPP.

Illegal Dumping

- Establish a system for tracking incidents. The system should be designed to identify the following:
 - Illegal dumping hot spots
 - Types and quantities (in some cases) of wastes
 - Patterns in time of occurrence (time of day/night, month, or year)
 - Mode of dumping (abandoned containers, "midnight dumping" from moving vehicles, direct dumping of materials, accidents/spills)
 - Responsible parties

Outreach

One of the keys to success of reducing or eliminating illegal dumping is increasing the number of people on the street who are aware of the problem and who have the tools to at least identify the incident, if not correct it. There are a number of ways of accomplishing this:

- Train municipal staff from all departments (public works, utilities, street cleaning, parks and recreation, industrial waste inspection, hazardous waste inspection, sewer maintenance) to recognize and report the incidents.
- Deputize municipal staff who may come into contact with illegal dumping with the authority to write illegal dumping tickets for offenders caught in the act (see below).
- Educate the public. As many as 3 out of 4 people do not understand that in most communities the storm drain does not go to the wastewater treatment plant. Unfortunately, with the heavy emphasis in recent years on public education about solid waste management, including recycling and household hazardous waste, the sewer system (both storm and sanitary) has been the likely recipient of cross-media transfers of waste.
- Provide the public with a mechanism for reporting incidents such as a hot line and/or door hanger (see below).
- Help areas where incidents occur more frequently set up environmental watch programs (like crime watch programs).
- Train volunteers to notice and report the presence and suspected source of an observed pollutant to the appropriate public agency.

What constitutes a “non-stormwater” discharge?

- Non-stormwater discharges are discharges not made up entirely of stormwater and include water used directly in the manufacturing process (process wastewater), air conditioning condensate and coolant, non-contact cooling water, cooling equipment condensate, outdoor secondary containment water, vehicle and equipment wash water, landscape irrigation, sink and drinking fountain wastewater, sanitary wastes, or other wastewaters.

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- Footing drains;
- Air conditioning condensation;
- Flows from riparian habitats and wetlands;
- Water line and hydrant flushing ;
- Landscape irrigation;
- Planned and unplanned discharges from potable water sources;
- Irrigation water;
- Individual residential car washing; and
- Lawn watering.

Municipal facilities subject to industrial general permit requirements must include a certification that the stormwater collection system has been tested or evaluated for the presence

of non-stormwater discharges. The state's General Industrial Stormwater Permit requires that non-stormwater discharges be eliminated prior to implementation of the facility's SWPPP.

Storm Drain Stenciling

- Stencil storm drain inlets with a message to prohibit illegal dumpings, especially in areas with waste handling facilities.
- Encourage public reporting of improper waste disposal by a HOTLINE number stenciled onto the storm drain inlet.
- See Supplemental Information section of this fact sheet for further detail on stenciling program approach.

Oil Recycling

- Contract collection and hauling of used oil to a private licensed used oil hauler/recycler.
- Comply with all applicable state and federal regulations regarding storage, handling, and transport of petroleum products.
- Create procedures for collection such as; collection locations and schedule, acceptable containers, and maximum amounts accepted.
- The California Integrated Waste Management Board has a Recycling Hotline, (800) 553-2962, that provides information and recycling locations for used oil.

Household Hazardous Waste

- Provide household hazardous waste (HHW) collection facilities. Several types of collection approaches are available including permanent, periodic, or mobile centers, curbside collection, or a combination of these systems.

Training

- Train municipal employees and contractors in proper and consistent methods for waste disposal.
- Train municipal employees to recognize and report illegal dumping.
- Train employees and subcontractors in proper hazardous waste management.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup
- Have spill cleanup materials readily available and in a known location.
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.

Other Considerations

- Federal Regulations (RCRA, SARA, CERCLA) and state regulations exist regarding the disposal of hazardous waste.
- Municipalities are required to have a used oil recycling element and a HHW element within their integrated waste management plan.
- Significant liability issues are involved with the collection, handling, and disposal of HHW.

Examples

The City of Palo Alto has developed a public participation program for reporting dumping violations. When a concerned citizen or public employee encounters evidence of illegal dumping, a door hanger (similar in format to hotel “Do Not Disturb” signs) is placed on the front doors in the neighborhood. The door hanger notes that a violation has occurred in the neighborhood, informs the reader why illegal dumping is a problem, and notes that illegal dumping carries a significant financial penalty. Information is also provided on what citizens can do as well as contact numbers for more information or to report a violation.

The Port of Long Beach has a state of the art database incorporating storm drain infrastructure, potential pollutant sources, facility management practices, and a pollutant tracking system.

The State Department of Fish and Game has a hotline for reporting violations called CalTIP (1-800-952-5400). The phone number may be used to report any violation of a Fish and Game code (illegal dumping, poaching, etc.).

The California Department of Toxic Substances Control’s Waste Alert Hotline, 1-800-69TOXIC, can be used to report hazardous waste violations.

References and Resources

<http://www.stormwatercenter.net/>

California’s Nonpoint Source Program Plan <http://www.co.clark.wa.us/pubworks/bmpman.pdf>

King County Stormwater Pollution Control Manual - <http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Orange County Stormwater Program,
http://www.ocwatersheds.com/stormwater/swp_introduction.asp

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program
(<http://www.projectcleanwater.org>)

Santa Clara Valley Urban Runoff Pollution Prevention Program
http://www.scvurppp-w2k.com/pdf%20documents/PS_ICID.PDF

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Spill Prevention, Control & Cleanup SC-11



Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Description

Spills and leaks, if not properly controlled, can adversely impact the storm drain system and receiving waters. Due to the type of work or the materials involved, many activities that occur either at a municipal facility or as a part of municipal field programs have the potential for accidental spills and leaks. Proper spill response planning and preparation can enable municipal employees to effectively respond to problems when they occur and minimize the discharge of pollutants to the environment.

Approach

- An effective spill response and control plan should include:
 - Spill/leak prevention measures;
 - Spill response procedures;
 - Spill cleanup procedures;
 - Reporting; and
 - Training
- A well thought out and implemented plan can prevent pollutants from entering the storm drainage system and can be used as a tool for training personnel to prevent and control future spills as well.

Pollution Prevention

- Develop and implement a Spill Prevention Control and Response Plan. The plan should include:

Targeted Constituents

Sediment	
Nutrients	☑
Trash	
Metals	☑
Bacteria	
Oil and Grease	☑
Organics	☑
Oxygen Demanding	☑



SC-11 Spill Prevention, Control & Cleanup

- A description of the facility, the address, activities and materials involved
- Identification of key spill response personnel
- Identification of the potential spill areas or operations prone to spills/leaks
- Identification of which areas should be or are bermed to contain spills/leaks
- Facility map identifying the key locations of areas, activities, materials, structural BMPs, etc.
- Material handling procedures
- Spill response procedures including:
 - Assessment of the site and potential impacts
 - Containment of the material
 - Notification of the proper personnel and evacuation procedures
 - Clean up of the site
 - Disposal of the waste material and
 - Proper record keeping
- Product substitution – use less toxic materials (i.e. use water based paints instead of oil based paints)
- Recycle, reclaim, or reuse materials whenever possible. This will reduce the amount of materials that are brought into the facility or into the field.

Suggested Protocols

Spill/Leak Prevention Measures

- If possible, move material handling indoors, under cover, or away from storm drains or sensitive water bodies.
- Properly label all containers so that the contents are easily identifiable.
- Berm storage areas so that if a spill or leak occurs, the material is contained.
- Cover outside storage areas either with a permanent structure or with a seasonal one such as a tarp so that rain can not come into contact with the materials.
- Check containers (and any containment sumps) often for leaks and spills. Replace containers that are leaking, corroded, or otherwise deteriorating with containers in good condition. Collect all spilled liquids and properly dispose of them.

Spill Prevention, Control & Cleanup SC-11

- Store, contain and transfer liquid materials in such a manner that if the container is ruptured or the contents spilled, they will not discharge, flow or be washed into the storm drainage system, surface waters, or groundwater.
- Place drip pans or absorbent materials beneath all mounted taps and at all potential drip and spill locations during the filling and unloading of containers. Any collected liquids or soiled absorbent materials should be reused/recycled or properly disposed of.
- For field programs, only transport the minimum amount of material needed for the daily activities and transfer materials between containers at a municipal yard where leaks and spill are easier to control.
- If paved, sweep and clean storage areas monthly, do not use water to hose down the area unless all of the water will be collected and disposed of properly.
- Install a spill control device (such as a tee section) in any catch basins that collect runoff from any storage areas if the materials stored are oil, gas, or other materials that separate from and float on water. This will allow for easier cleanup if a spill occurs.
- If necessary, protect catch basins while conducting field activities so that if a spill occurs, the material will be contained.

Training

- Educate employees about spill prevention, spill response and cleanup on a routine basis.
- Well-trained employees can reduce human errors that lead to accidental releases or spills:
 - The employees should have the tools and knowledge to immediately begin cleaning up a spill if one should occur.
 - Employees should be familiar with the Spill Prevention Control and Countermeasure Plan if one is available.
- Training of staff from all municipal departments should focus on recognizing and reporting potential or current spills/leaks and who they should contact.
- Employees responsible for aboveground storage tanks and liquid transfers for large bulk containers should be thoroughly familiar with the Spill Prevention Control and Countermeasure Plan and the plan should be readily available.

Spill Response and Prevention

- Identify key spill response personnel and train employees on who they are.
- Store and maintain appropriate spill cleanup materials in a clearly marked location near storage areas; and train employees to ensure familiarity with the site's spill control plan and/or proper spill cleanup procedures.
- Locate spill cleanup materials, such as absorbents, where they will be readily accessible (e.g. near storage and maintenance areas, on field trucks).

SC-11 Spill Prevention, Control & Cleanup

- Follow the Spill Prevention Control and Countermeasure Plan if one is available.
- If a spill occurs, notify the key spill response personnel immediately. If the material is unknown or hazardous, the local fire department may also need to be contacted.
- If safe to do so, attempt to contain the material and block the nearby storm drains so that the area impacted is minimized. If the material is unknown or hazardous wait for properly trained personnel to contain the materials.
- Perform an assessment of the area where the spill occurred and the downstream area that it could impact. Relay this information to the key spill response and clean up personnel.

Spill Cleanup Procedures

- Small non-hazardous spills
 - Use a rag, damp cloth or absorbent materials for general clean up of liquids
 - Use brooms or shovels for the general clean up of dry materials
 - If water is used, it must be collected and properly disposed of. The wash water can not be allowed to enter the storm drain.
 - Dispose of any waste materials properly
 - Clean or dispose of any equipment used to clean up the spill properly
- Large non-hazardous spills
 - Use absorbent materials for general clean up of liquids
 - Use brooms, shovels or street sweepers for the general clean up of dry materials
 - If water is used, it must be collected and properly disposed of. The wash water can not be allowed to enter the storm drain.
 - Dispose of any waste materials properly
 - Clean or dispose of any equipment used to clean up the spill properly
- For hazardous or very large spills, a private cleanup company or Hazmat team may need to be contacted to assess the situation and conduct the cleanup and disposal of the materials.
- Chemical cleanups of material can be achieved with the use of absorbents, gels, and foams. Remove the adsorbent materials promptly and dispose of according to regulations.
- If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.

Reporting

- Report any spills immediately to the identified key municipal spill response personnel.

Spill Prevention, Control & Cleanup SC-11

- Report spills in accordance with applicable reporting laws. Spills that pose an immediate threat to human health or the environment must be reported immediately to the Office of Emergency Service (OES)
- Spills that pose an immediate threat to human health or the environment may also need to be reported within 24 hours to the Regional Water Quality Control Board.
- Federal regulations require that any oil spill into a water body or onto an adjoining shoreline be reported to the National Response Center (NRC) at 800-424-8802 (24 hour)
- After the spill has been contained and cleaned up, a detailed report about the incident should be generated and kept on file (see the section on Reporting below). The incident may also be used in briefing staff about proper procedures

Other Considerations

- A Spill Prevention Control and Countermeasure Plan (SPCC) is required for facilities that are subject to the oil pollution regulations specified in Part 112 of Title 40 of the Code of Federal Regulations or if they have a storage capacity of 10,000 gallons or more of petroleum. (Health and Safety Code 6.67)
- State regulations also exist for storage of hazardous materials (Health & Safety Code Chapter 6.95), including the preparation of area and business plans for emergency response to the releases or threatened releases.
- Consider requiring smaller secondary containment areas (less than 200 sq. ft.) to be connected to the sanitary sewer, if permitted to do so, prohibiting any hard connections to the storm drain.

Requirements

Costs

- Will vary depending on the size of the facility and the necessary controls.
- Prevention of leaks and spills is inexpensive. Treatment and/or disposal of wastes, contaminated soil and water is very expensive

Maintenance

- This BMP has no major administrative or staffing requirements. However, extra time is needed to properly handle and dispose of spills, which results in increased labor costs

Supplemental Information

Further Detail of the BMP

Reporting

Record keeping and internal reporting represent good operating practices because they can increase the efficiency of the response and containment of a spill. A good record keeping system helps the municipality minimize incident recurrence, correctly respond with appropriate containment and cleanup activities, and comply with legal requirements.

SC-11 Spill Prevention, Control & Cleanup

A record keeping and reporting system should be set up for documenting spills, leaks, and other discharges, including discharges of hazardous substances in reportable quantities. Incident records describe the quality and quantity of non-stormwater discharges to the storm drain.

These records should contain the following information:

- Date and time of the incident
- Weather conditions
- Duration of the spill/leak/discharge
- Cause of the spill/leak/discharge
- Response procedures implemented
- Persons notified
- Environmental problems associated with the spill/leak/discharge

Separate record keeping systems should be established to document housekeeping and preventive maintenance inspections, and training activities. All housekeeping and preventive maintenance inspections should be documented. Inspection documentation should contain the following information:

- The date and time the inspection was performed
- Name of the inspector
- Items inspected
- Problems noted
- Corrective action required
- Date corrective action was taken

Other means to document and record inspection results are field notes, timed and dated photographs, videotapes, and drawings and maps.

Examples

The City of Palo Alto includes spill prevention and control as a major element of its highly effective program for municipal vehicle maintenance shops.

References and Resources

King County Stormwater Pollution Control Manual - <http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Orange County Stormwater Program

http://www.ocwatersheds.com/stormwater/swp_introduction.asp

Spill Prevention, Control & Cleanup SC-11

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program
(URMP)

<http://www.projectcleanwater.org/pdf/Model%20Program%20Municipal%20Facilities.pdf>

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Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Description

Improper storage and handling of solid wastes can allow toxic compounds, oils and greases, heavy metals, nutrients, suspended solids, and other pollutants to enter stormwater runoff. The discharge of pollutants to stormwater from waste handling and disposal can be prevented and reduced by tracking waste generation, storage, and disposal; reducing waste generation and disposal through source reduction, re-use, and recycling; and preventing runoff and runoff.

Approach

Pollution Prevention

- Reduction in the amount of waste generated can be accomplished using the following source controls such as:
 - Production planning and sequencing
 - Process or equipment modification
 - Raw material substitution or elimination
 - Loss prevention and housekeeping
 - Waste segregation and separation
 - Close loop recycling
- Establish a material tracking system to increase awareness about material usage. This may reduce spills and minimize contamination, thus reducing the amount of waste produced.
- Recycle materials whenever possible.

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input checked="" type="checkbox"/>
Trash	<input checked="" type="checkbox"/>
Metals	<input checked="" type="checkbox"/>
Bacteria	<input checked="" type="checkbox"/>
Oil and Grease	<input checked="" type="checkbox"/>
Organics	<input checked="" type="checkbox"/>
Oxygen Demanding	<input checked="" type="checkbox"/>



Suggested Protocols***General***

- Cover storage containers with leak proof lids or some other means. If waste is not in containers, cover all waste piles (plastic tarps are acceptable coverage) and prevent stormwater runoff and runoff with a berm. The waste containers or piles must be covered except when in use.
- Use drip pans or absorbent materials whenever grease containers are emptied by vacuum trucks or other means. Grease cannot be left on the ground. Collected grease must be properly disposed of as garbage.
- Check storage containers weekly for leaks and to ensure that lids are on tightly. Replace any that are leaking, corroded, or otherwise deteriorating.
- Sweep and clean the storage area regularly. If it is paved, do not hose down the area to a storm drain.
- Dispose of rinse and wash water from cleaning waste containers into a sanitary sewer if allowed by the local sewer authority. Do not discharge wash water to the street or storm drain.
- Transfer waste from damaged containers into safe containers.
- Take special care when loading or unloading wastes to minimize losses. Loading systems can be used to minimize spills and fugitive emission losses such as dust or mist. Vacuum transfer systems can minimize waste loss.

Controlling Litter

- Post “No Littering” signs and enforce anti-litter laws.
- Provide a sufficient number of litter receptacles for the facility.
- Clean out and cover litter receptacles frequently to prevent spillage.

Waste Collection

- Keep waste collection areas clean.
- Inspect solid waste containers for structural damage or leaks regularly. Repair or replace damaged containers as necessary.
- Secure solid waste containers; containers must be closed tightly when not in use.
- Place waste containers under cover if possible.
- Do not fill waste containers with washout water or any other liquid.
- Ensure that only appropriate solid wastes are added to the solid waste container. Certain wastes such as hazardous wastes, appliances, fluorescent lamps, pesticides, etc. may not be

disposed of in solid waste containers (see chemical/ hazardous waste collection section below).

- Do not mix wastes; this can cause chemical reactions, make recycling impossible, and complicate disposal.

Good Housekeeping

- Use all of the product before disposing of the container.
- Keep the waste management area clean at all times by sweeping and cleaning up spills immediately.
- Use dry methods when possible (e.g. sweeping, use of absorbents) when cleaning around restaurant/food handling dumpster areas. If water must be used after sweeping/using absorbents, collect water and discharge through grease interceptor to the sewer.
- Stencil storm drains on the facility's property with prohibitive message regarding waste disposal.

Chemical/Hazardous Wastes

- Select designated hazardous waste collection areas on-site.
- Store hazardous materials and wastes in covered containers protected from vandalism, and in compliance with fire and hazardous waste codes.
- Place hazardous waste containers in secondary containment.
- Make sure that hazardous waste is collected, removed, and disposed of only at authorized disposal areas.

Runon/Runoff Prevention

- Prevent stormwater runon from entering the waste management area by enclosing the area or building a berm around the area.
- Prevent the waste materials from directly contacting rain.
- Cover waste piles with temporary covering material such as reinforced tarpaulin, polyethylene, polyurethane, polypropylene or hypalon.
- Cover the area with a permanent roof if feasible.
- Cover dumpsters to prevent rain from washing waste out of holes or cracks in the bottom of the dumpster.
- Move the activity indoor after ensuring all safety concerns such as fire hazard and ventilation are addressed.

Inspection

- Inspect and replace faulty pumps or hoses regularly to minimize the potential of releases and spills.
- Check waste management areas for leaking containers or spills.
- Repair leaking equipment including valves, lines, seals, or pumps promptly.

Training

- Train staff pollution prevention measures and proper disposal methods.
- Train employees and contractors proper spill containment and cleanup. The employee should have the tools and knowledge to immediately begin cleaning up a spill if one should occur.
- Train employees and subcontractors in proper hazardous waste management.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup.
- Keep your Spill Prevention Control and countermeasure (SPCC) plan up-to-date, and implement accordingly.
- Have spill cleanup materials readily available and in a known location.
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.
- Vehicles transporting waste should have spill prevention equipment that can prevent spills during transport. The spill prevention equipment includes:
 - Vehicles equipped with baffles for liquid waste
 - Trucks with sealed gates and spill guards for solid waste

Other Considerations

- Hazardous waste cannot be re-used or recycled; it must be disposed of by a licensed hazardous waste hauler.

Requirements***Costs***

- Capital and operation and maintenance costs will vary substantially depending on the size of the facility and the types of waste handled. Costs should be low if there is an inventory program in place.

Maintenance

- None except for maintaining equipment for material tracking program.

Supplemental Information

Further Detail of the BMP

Land Treatment System

- Minimize the runoff of polluted stormwater from land application of municipal waste on-site by:
 - Choosing a site where slopes are under 6%, the soil is permeable, there is a low water table, it is located away from wetlands or marshes, there is a closed drainage system.
 - Avoiding application of waste to the site when it is raining or when the ground is saturated with water.
 - Growing vegetation on land disposal areas to stabilize soils and reduce the volume of surface water runoff from the site.
 - Maintaining adequate barriers between the land application site and the receiving waters. Planted strips are particularly good.
 - Using erosion control techniques such as mulching and matting, filter fences, straw bales, diversion terracing, and sediment basins.
 - Performing routine maintenance to ensure the erosion control or site stabilization measures are working.

References and Resources

King County Stormwater Pollution Control Manual - <http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Orange County Stormwater Program

http://www.ocwatersheds.com/StormWater/swp_introduction.asp

Pollution from Surface Cleaning Folder. 1996. Bay Area Stormwater Management Agencies Associations (BASMAA). On-line: <http://www.basmaa.org>

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Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Description

Stormwater runoff from building and grounds maintenance activities can be contaminated with toxic hydrocarbons in solvents, fertilizers and pesticides, suspended solids, heavy metals, and abnormal pH. Utilizing the following protocols will prevent or reduce the discharge of pollutants to stormwater from building and grounds maintenance activities by washing and cleaning up with as little water as possible, following good landscape management practices, preventing and cleaning up spills immediately, keeping debris from entering the storm drains, and maintaining the stormwater collection system.

Approach

Pollution Prevention

- Switch to non-toxic chemicals for maintenance when possible.
- Choose cleaning agents that can be recycled.
- Encourage proper lawn management and landscaping, including use of native vegetation.
- Encourage use of Integrated Pest Management techniques for pest control.
- Encourage proper onsite recycling of yard trimmings.
- Recycle residual paints, solvents, lumber, and other material as much as possible.

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input checked="" type="checkbox"/>
Trash	<input checked="" type="checkbox"/>
Metals	<input checked="" type="checkbox"/>
Bacteria	<input checked="" type="checkbox"/>
Oil and Grease	<input checked="" type="checkbox"/>
Organics	<input checked="" type="checkbox"/>
Oxygen Demanding	<input checked="" type="checkbox"/>



SC-41 Building & Grounds Maintenance

Suggested Protocols

Pressure Washing of Buildings, Rooftops, and Other Large Objects

- In situations where soaps or detergents are used and the surrounding area is paved, pressure washers must use a waste water collection device that enables collection of wash water and associated solids. A sump pump, wet vacuum or similarly effective device must be used to collect the runoff and loose materials. The collected runoff and solids must be disposed of properly.
- If soaps or detergents are not used, and the surrounding area is paved, wash water runoff does not have to be collected but must be screened. Pressure washers must use filter fabric or some other type of screen on the ground and/or in the catch basin to trap the particles in wash water runoff.
- If you are pressure washing on a grassed area (with or without soap), runoff must be dispersed as sheet flow as much as possible, rather than as a concentrated stream. The wash runoff must remain on the grass and not drain to pavement. Ensure that this practice does not kill grass.

Landscaping Activities

- Do not apply any chemicals (insecticide, herbicide, or fertilizer) directly to surface waters, unless the application is approved and permitted by the state.
- Dispose of grass clippings, leaves, sticks, or other collected vegetation as garbage, or by composting. Do not dispose of collected vegetation into waterways or storm drainage systems.
- Use mulch or other erosion control measures on exposed soils.
- Check irrigation schedules so pesticides will not be washed away and to minimize non-stormwater discharge.

Building Repair, Remodeling, and Construction

- Do not dump any toxic substance or liquid waste on the pavement, the ground, or toward a storm drain.
- Use ground or drop cloths underneath outdoor painting, scraping, and sandblasting work, and properly dispose of collected material daily.
- Use a ground cloth or oversized tub for activities such as paint mixing and tool cleaning.
- Clean paint brushes and tools covered with water-based paints in sinks connected to sanitary sewers or in portable containers that can be dumped into a sanitary sewer drain. Brushes and tools covered with non-water-based paints, finishes, or other materials must be cleaned in a manner that enables collection of used solvents (e.g., paint thinner, turpentine, etc.) for recycling or proper disposal.

- Use a storm drain cover, filter fabric, or similarly effective runoff control mechanism if dust, grit, wash water, or other pollutants may escape the work area and enter a catch basin. The containment device(s) must be in place at the beginning of the work day, and accumulated dirty runoff and solids must be collected and disposed of before removing the containment device(s) at the end of the work day.
- If you need to de-water an excavation site, you may need to filter the water before discharging to a catch basin or off-site. In which case you should direct the water through hay bales and filter fabric or use other sediment filters or traps.
- Store toxic material under cover with secondary containment during precipitation events and when not in use. A cover would include tarps or other temporary cover material.

Mowing, Trimming, and Planting

- Dispose of leaves, sticks, or other collected vegetation as garbage, by composting or at a permitted landfill. Do not dispose of collected vegetation into waterways or storm drainage systems.
- Use mulch or other erosion control measures when soils are exposed.
- Place temporarily stockpiled material away from watercourses and drain inlets, and berm or cover stockpiles to prevent material releases to the storm drain system.
- Consider an alternative approach when bailing out muddy water; do not put it in the storm drain, pour over landscaped areas.
- Use hand or mechanical weeding where practical.

Fertilizer and Pesticide Management

- Follow all federal, state, and local laws and regulations governing the use, storage, and disposal of fertilizers and pesticides and training of applicators and pest control advisors.
- Follow manufacturers' recommendations and label directions. Pesticides must never be applied if precipitation is occurring or predicted. Do not apply insecticides within 100 feet of surface waters such as lakes, ponds, wetlands, and streams.
- Use less toxic pesticides that will do the job, whenever possible. Avoid use of copper-based pesticides if possible.
- Do not use pesticides if rain is expected.
- Do not mix or prepare pesticides for application near storm drains.
- Use the minimum amount needed for the job.
- Calibrate fertilizer distributors to avoid excessive application.
- Employ techniques to minimize off-target application (e.g. spray drift) of pesticides, including consideration of alternative application techniques.

SC-41 Building & Grounds Maintenance

- Apply pesticides only when wind speeds are low.
- Work fertilizers into the soil rather than dumping or broadcasting them onto the surface.
- Irrigate slowly to prevent runoff and then only as much as is needed.
- Clean pavement and sidewalk if fertilizer is spilled on these surfaces before applying irrigation water.
- Dispose of empty pesticide containers according to the instructions on the container label.
- Use up the pesticides. Rinse containers, and use rinse water as product. Dispose of unused pesticide as hazardous waste.
- Implement storage requirements for pesticide products with guidance from the local fire department and County Agricultural Commissioner. Provide secondary containment for pesticides.

Inspection

- Inspect irrigation system periodically to ensure that the right amount of water is being applied and that excessive runoff is not occurring. Minimize excess watering, and repair leaks in the irrigation system as soon as they are observed.

Training

- Educate and train employees on use of pesticides and in pesticide application techniques to prevent pollution.
- Train employees and contractors in proper techniques for spill containment and cleanup.
- Be sure the frequency of training takes into account the complexity of the operations and the nature of the staff.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup
- Keep your Spill Prevention Control and countermeasure (SPCC) plan up-to-date, and implement accordingly.
- Have spill cleanup materials readily available and in a known location.
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.

Other Considerations

- Alternative pest/weed controls may not be available, suitable, or effective in many cases.

Requirements

Costs

- Overall costs should be low in comparison to other BMPs.

Maintenance

- Sweep paved areas regularly to collect loose particles, and wipe up spills with rags and other absorbent material immediately, do not hose down the area to a storm drain.

Supplemental Information

Further Detail of the BMP

Fire Sprinkler Line Flushing

Building fire sprinkler line flushing may be a source of non-stormwater runoff pollution. The water entering the system is usually potable water though in some areas it may be non-potable reclaimed wastewater. There are subsequent factors that may drastically reduce the quality of the water in such systems. Black iron pipe is usually used since it is cheaper than potable piping but it is subject to rusting and results in lower quality water. Initially the black iron pipe has an oil coating to protect it from rusting between manufacture and installation; this will contaminate the water from the first flush but not from subsequent flushes. Nitrates, poly-phosphates and other corrosion inhibitors, as well as fire suppressants and antifreeze may be added to the sprinkler water system. Water generally remains in the sprinkler system a long time, typically a year, between flushes and may accumulate iron, manganese, lead, copper, nickel and zinc. The water generally becomes anoxic and contains living and dead bacteria and breakdown products from chlorination. This may result in a significant BOD problem and the water often smells. Consequently dispose fire sprinkler line flush water into the sanitary sewer. Do not allow discharge to storm drain or infiltration due to potential high levels of pollutants in fire sprinkler line water.

References and Resources

California's Nonpoint Source Program Plan <http://www.swrcb.ca.gov/nps/index.html>

King County - <ftp://dnr.metrokc.gov/wlr/dss/spcm/Chapter%203.PDF>

Orange County Stormwater Program

http://www.ocwatersheds.com/StormWater/swp_introduction.asp

Mobile Cleaners Pilot Program: Final Report. 1997. Bay Area Stormwater Management Agencies Association (BASSMA) <http://www.basmaa.org/>

Pollution from Surface Cleaning Folder. 1996. Bay Area Stormwater Management Agencies Association (BASMAA) <http://www.basmaa.org/>

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program (URMP) -

<http://www.projectcleanwater.org/pdf/Model%20Program%20Municipal%20Facilities.pdf>

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Description

Promote efficient and safe housekeeping practices (storage, use, and cleanup) when handling potentially harmful materials such as fertilizers, pesticides, cleaning solutions, paint products, automotive products, and swimming pool chemicals. Related information is provided in BMP fact sheets SC-11 Spill Prevention, Control & Cleanup and SC-34 Waste Handling & Disposal.

Approach

Pollution Prevention

- Purchase only the amount of material that will be needed for foreseeable use. In most cases this will result in cost savings in both purchasing and disposal. See SC-61 Safer Alternative Products for additional information.
- Be aware of new products that may do the same job with less environmental risk and for less or the equivalent cost. Total cost must be used here; this includes purchase price, transportation costs, storage costs, use related costs, clean up costs and disposal costs.

Suggested Protocols

General

- Keep work sites clean and orderly. Remove debris in a timely fashion. Sweep the area.
- Dispose of wash water, sweepings, and sediments, properly.
- Recycle or dispose of fluids properly.
- Establish a daily checklist of office, yard and plant areas to confirm cleanliness and adherence to proper storage and security. Specific employees should be assigned specific inspection responsibilities and given the authority to remedy any problems found.
- Post waste disposal charts in appropriate locations detailing for each waste its hazardous nature (poison, corrosive, flammable), prohibitions on its disposal (dumpster, drain, sewer) and the recommended disposal method (recycle, sewer, burn, storage, landfill).
- Summarize the chosen BMPs applicable to your operation and post them in appropriate conspicuous places.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input checked="" type="checkbox"/>
Trash	<input checked="" type="checkbox"/>
Metals	<input checked="" type="checkbox"/>
Bacteria	<input checked="" type="checkbox"/>
Oil and Grease	<input checked="" type="checkbox"/>
Organics	<input checked="" type="checkbox"/>
Oxygen Demanding	<input checked="" type="checkbox"/>



- Require a signed checklist from every user of any hazardous material detailing amount taken, amount used, amount returned and disposal of spent material.
- Do a before audit of your site to establish baseline conditions and regular subsequent audits to note any changes and whether conditions are improving or deteriorating.
- Keep records of water, air and solid waste quantities and quality tests and their disposition.
- Maintain a mass balance of incoming, outgoing and on hand materials so you know when there are unknown losses that need to be tracked down and accounted for.
- Use and reward employee suggestions related to BMPs, hazards, pollution reduction, work place safety, cost reduction, alternative materials and procedures, recycling and disposal.
- Have, and review regularly, a contingency plan for spills, leaks, weather extremes etc. Make sure all employees know about it and what their role is so that it comes into force automatically.

Training

- Train all employees, management, office, yard, manufacturing, field and clerical in BMPs and pollution prevention and make them accountable.
- Train municipal employees who handle potentially harmful materials in good housekeeping practices.
- Train personnel who use pesticides in the proper use of the pesticides. The California Department of Pesticide Regulation license pesticide dealers, certify pesticide applicators and conduct onsite inspections.
- Train employees and contractors in proper techniques for spill containment and cleanup. The employee should have the tools and knowledge to immediately begin cleaning up a spill if one should occur.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup.
- Keep your Spill Prevention Control and Countermeasure (SPCC) plan up-to-date, and implement accordingly.
- Have spill cleanup materials readily available and in a known location.
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.

Other Considerations

- There are no major limitations to this best management practice.
- There are no regulatory requirements to this BMP. Existing regulations already require municipalities to properly store, use, and dispose of hazardous materials

Requirements

Costs

- Minimal cost associated with this BMP. Implementation of good housekeeping practices may result in cost savings as these procedures may reduce the need for more costly BMPs.

Maintenance

- Ongoing maintenance required to keep a clean site. Level of effort is a function of site size and type of activities.

Supplemental Information

Further Detail of the BMP

- The California Integrated Waste Management Board's Recycling Hotline, 1-800-553-2962, provides information on household hazardous waste collection programs and facilities.

Examples

There are a number of communities with effective programs. The most pro-active include Santa Clara County and the City of Palo Alto, the City and County of San Francisco, and the Municipality of Metropolitan Seattle (Metro).

References and Resources

British Columbia Lake Stewardship Society. Best Management Practices to Protect Water Quality from Non-Point Source Pollution. March 2000.

<http://www.nalms.org/bclss/bmphome.html#bmp>

King County Stormwater Pollution Control Manual - <http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Model Urban Runoff Program: A How-To Guide for Developing Urban Runoff Programs for Small Municipalities, Prepared by City of Monterey, City of Santa Cruz, California Coastal Commission, Monterey Bay National Marine Sanctuary, Association of Monterey Bay Area Governments, Woodward-Clyde, Central Coast Regional Water Quality Control Board. July, 1998, Revised by California Coastal Commission, February 2002.

Orange County Stormwater Program

http://www.ocwatersheds.com/stormwater/swp_introduction.asp

San Mateo STOPPP - (<http://stoppp.tripod.com/bmp.html>)

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Description

Pollutants on sidewalks and other pedestrian traffic areas and plazas are typically due to littering and vehicle use. This fact sheet describes good housekeeping practices that can be incorporated into the municipality's existing cleaning and maintenance program.

Approach

Pollution Prevention

- Use dry cleaning methods whenever practical for surface cleaning activities.
- Use the least toxic materials available (e.g. water based paints, gels or sprays for graffiti removal).

Suggested Protocols

Surface Cleaning

- Regularly broom (dry) sweep sidewalk, plaza and parking lot areas to minimize cleaning with water.
- Dry cleanup first (sweep, collect, and dispose of debris and trash) when cleaning sidewalks or plazas, then wash with or without soap.
- Block the storm drain or contain runoff when cleaning with water. Discharge wash water to landscaping or collect water and pump to a tank or discharge to sanitary sewer if allowed. (Permission may be required from local sanitation district.)

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input checked="" type="checkbox"/>
Trash	<input checked="" type="checkbox"/>
Metals	<input checked="" type="checkbox"/>
Bacteria	<input checked="" type="checkbox"/>
Oil and Grease	<input checked="" type="checkbox"/>
Organics	<input checked="" type="checkbox"/>
Oxygen Demanding	<input checked="" type="checkbox"/>



- Block the storm drain or contain runoff when washing parking areas, driveways or drive-throughs. Use absorbents to pick up oil; then dry sweep. Clean with or without soap. Collect water and pump to a tank or discharge to sanitary sewer if allowed. Street Repair and Maintenance.

Graffiti Removal

- Avoid graffiti abatement activities during rain events.
- Implement the procedures under Painting and Paint Removal in SC-70 Roads, Streets, and Highway Operation and Maintenance fact sheet when graffiti is removed by painting over.
- Direct runoff from sand blasting and high pressure washing (with no cleaning agents) into a dirt or landscaped area after treating with an appropriate filtering device.
- Plug nearby storm drain inlets and vacuum/pump wash water to the sanitary sewer if authorized to do so if a graffiti abatement method generates wash water containing a cleaning compound (such as high pressure washing with a cleaning compound). Ensure that a non-hazardous cleaning compound is used or dispose as hazardous waste, as appropriate.

Surface Removal and Repair

- Schedule surface removal activities for dry weather if possible.
- Avoid creating excess dust when breaking asphalt or concrete.
- Take measures to protect nearby storm drain inlets prior to breaking up asphalt or concrete (e.g. place hay bales or sand bags around inlets). Clean afterwards by sweeping up as much material as possible.
- Designate an area for clean up and proper disposal of excess materials.
- Remove and recycle as much of the broken pavement as possible to avoid contact with rainfall and stormwater runoff.
- When making saw cuts in pavement, use as little water as possible. Cover each storm drain inlet completely with filter fabric during the sawing operation and contain the slurry by placing straw bales, sandbags, or gravel dams around the inlets. After the liquid drains or evaporates, shovel or vacuum the slurry residue from the pavement or gutter and remove from site.
- Always dry sweep first to clean up tracked dirt. Use a street sweeper or vacuum truck. Do not dump vacuumed liquid in storm drains. Once dry sweeping is complete, the area may be hosed down if needed. Wash water should be directed to landscaping or collected and pumped to the sanitary sewer if allowed.

Concrete Installation and Repair

- Schedule asphalt and concrete activities for dry weather.

- Take measures to protect any nearby storm drain inlets and adjacent watercourses, prior to breaking up asphalt or concrete (e.g. place sand bags around inlets or work areas).
- Limit the amount of fresh concrete or cement mortar mixed, mix only what is needed for the job.
- Store concrete materials under cover, away from drainage areas. Secure bags of cement after they are open. Be sure to keep wind-blown cement powder away from streets, gutters, storm drains, rainfall, and runoff.
- Return leftover materials to the transit mixer. Dispose of small amounts of hardened excess concrete, grout, and mortar in the trash.
- Do not wash sweepings from exposed aggregate concrete into the street or storm drain. Collect and return sweepings to aggregate base stockpile, or dispose in the trash.
- Protect applications of fresh concrete from rainfall and runoff until the material has dried.
- Do not allow excess concrete to be dumped onsite, except in designated areas.
- Wash concrete trucks off site or in designated areas on site designed to preclude discharge of wash water to drainage system.

Controlling Litter

- Post “No Littering” signs and enforce anti-litter laws.
- Provide litter receptacles in busy, high pedestrian traffic areas of the community, at recreational facilities, and at community events.
- Cover litter receptacles and clean out frequently to prevent leaking/spillage or overflow.
- Clean parking lots on a regular basis with a street sweeper.

Training

- Provide regular training to field employees and/or contractors regarding surface cleaning and proper operation of equipment.
- Train employee and contractors in proper techniques for spill containment and cleanup.
- Use a training log or similar method to document training.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup.
- Have spill cleanup materials readily available and in a known location.
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.

Other Considerations

- Limitations related to sweeping activities at large parking facilities may include current sweeper technology to remove oil and grease.
- Surface cleaning activities that require discharges to the local sewerage agency will require coordination with the agency.
- Arrangements for disposal of the swept material collected must be made, as well as accurate tracking of the areas swept and the frequency of sweeping.

Requirements***Costs***

- The largest expenditures for sweeping and cleaning of sidewalks, plazas, and parking lots are in staffing and equipment. Sweeping of these areas should be incorporated into street sweeping programs to reduce costs.

Maintenance

Not applicable

Supplemental Information***Further Detail of the BMP***

Community education, such as informing residents about their options for recycling and waste disposal, as well as the consequences of littering, can instill a sense of citizen responsibility and potentially reduce the amount of maintenance required by the municipality.

Additional BMPs that should be considered for parking lot areas include:

- Allow sheet runoff to flow into biofilters (vegetated strip and swale) and infiltration devices.
- Utilize sand filters or oleophilic collectors for oily waste in low concentrations.
- Arrange rooftop drains to prevent drainage directly onto paved surfaces.
- Design lot to include semi-permeable hardscape.
- Structural BMPs such as storm drain inlet filters can be very effective in reducing the amount of pollutants discharged from parking facilities during periods of rain.

References and Resources

Bay Area Stormwater Management Agencies Association (BASMAA). 1996. Pollution From Surface Cleaning Folder <http://www.basmaa.org>

Model Urban Runoff Program: A How-To Guide for Developing Urban Runoff Programs for Small Municipalities. Prepared by City of Monterey, City of Santa Cruz, California Coastal Commission, Monterey Bay National Marine Sanctuary, Association of Monterey Bay Area Governments, Woodward-Clyde, Central Coast Regional Water Quality Control Board. July. 1998.

Oregon Association of Clean Water Agencies. Oregon Municipal Stormwater Toolbox for Maintenance Practices. June 1998.

Orange County Stormwater Program

http://www.ocwatersheds.com/stormwater/swp_introduction.asp

Santa Clara Valley Urban Runoff Pollution Prevention Program. 1997 Urban Runoff Management Plan. September 1997, updated October 2000.

Santa Clara Valley Urban Runoff Pollution Prevention Program. Maintenance Best Management Practices for the Construction Industry. Brochures: Landscaping, Gardening, and Pool; Roadwork and Paving; and Fresh Concrete and Mortar Application. June 2001.

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Plan. 2001. Municipal Activities Model Program Guidance. November.

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Description

Landscape maintenance activities include vegetation removal; herbicide and insecticide application; fertilizer application; watering; and other gardening and lawn care practices. Vegetation control typically involves a combination of chemical (herbicide) application and mechanical methods. All of these maintenance practices have the potential to contribute pollutants to the storm drain system. The major objectives of this BMP are to minimize the discharge of pesticides, herbicides and fertilizers to the storm drain system and receiving waters; prevent the disposal of landscape waste into the storm drain system by collecting and properly disposing of clippings and cuttings, and educating employees and the public.

Approach

Pollution Prevention

- Implement an integrated pest management (IPM) program. IPM is a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools.
- Choose low water using flowers, trees, shrubs, and groundcover.
- Consider alternative landscaping techniques such as naturescaping and xeriscaping.
- Conduct appropriate maintenance (i.e. properly timed fertilizing, weeding, pest control, and pruning) to help preserve the landscapes water efficiency.

Objectives

- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input checked="" type="checkbox"/>
Trash	<input checked="" type="checkbox"/>
Metals	
Bacteria	
Oil and Grease	
Organics	
Oxygen Demanding	<input checked="" type="checkbox"/>



- Consider grass cycling (grass cycling is the natural recycling of grass by leaving the clippings on the lawn when mowing. Grass clippings decompose quickly and release valuable nutrients back into the lawn).

Suggested Protocols***Mowing, Trimming, and Weeding***

- Whenever possible use mechanical methods of vegetation removal (e.g mowing with tractor-type or push mowers, hand cutting with gas or electric powered weed trimmers) rather than applying herbicides. Use hand weeding where practical.
- Avoid loosening the soil when conducting mechanical or manual weed control, this could lead to erosion. Use mulch or other erosion control measures when soils are exposed.
- Performing mowing at optimal times. Mowing should not be performed if significant rain events are predicted.
- Mulching mowers may be recommended for certain flat areas. Other techniques may be employed to minimize mowing such as selective vegetative planting using low maintenance grasses and shrubs.
- Collect lawn and garden clippings, pruning waste, tree trimmings, and weeds. Chip if necessary, and compost or dispose of at a landfill (see waste management section of this fact sheet).
- Place temporarily stockpiled material away from watercourses, and berm or cover stockpiles to prevent material releases to storm drains.

Planting

- Determine existing native vegetation features (location, species, size, function, importance) and consider the feasibility of protecting them. Consider elements such as their effect on drainage and erosion, hardiness, maintenance requirements, and possible conflicts between preserving vegetation and the resulting maintenance needs.
- Retain and/or plant selected native vegetation whose features are determined to be beneficial, where feasible. Native vegetation usually requires less maintenance (e.g., irrigation, fertilizer) than planting new vegetation.
- Consider using low water use groundcovers when planting or replanting.

Waste Management

- Compost leaves, sticks, or other collected vegetation or dispose of at a permitted landfill. Do not dispose of collected vegetation into waterways or storm drainage systems.
- Place temporarily stockpiled material away from watercourses and storm drain inlets, and berm or cover stockpiles to prevent material releases to the storm drain system.
- Reduce the use of high nitrogen fertilizers that produce excess growth requiring more frequent mowing or trimming.

- Avoid landscape wastes in and around storm drain inlets by either using bagging equipment or by manually picking up the material.

Irrigation

- Where practical, use automatic timers to minimize runoff.
- Use popup sprinkler heads in areas with a lot of activity or where there is a chance the pipes may be broken. Consider the use of mechanisms that reduce water flow to sprinkler heads if broken.
- Ensure that there is no runoff from the landscaped area(s) if re-claimed water is used for irrigation.
- If bailing of muddy water is required (e.g. when repairing a water line leak), do not put it in the storm drain; pour over landscaped areas.
- Irrigate slowly or pulse irrigate to prevent runoff and then only irrigate as much as is needed.
- Apply water at rates that do not exceed the infiltration rate of the soil.

Fertilizer and Pesticide Management

- Utilize a comprehensive management system that incorporates integrated pest management (IPM) techniques. There are many methods and types of IPM, including the following:
 - Mulching can be used to prevent weeds where turf is absent, fencing installed to keep rodents out, and netting used to keep birds and insects away from leaves and fruit.
 - Visible insects can be removed by hand (with gloves or tweezers) and placed in soapy water or vegetable oil. Alternatively, insects can be sprayed off the plant with water or in some cases vacuumed off of larger plants.
 - Store-bought traps, such as species-specific, pheromone-based traps or colored sticky cards, can be used.
 - Slugs can be trapped in small cups filled with beer that are set in the ground so the slugs can get in easily.
 - In cases where microscopic parasites, such as bacteria and fungi, are causing damage to plants, the affected plant material can be removed and disposed of (pruning equipment should be disinfected with bleach to prevent spreading the disease organism).
 - Small mammals and birds can be excluded using fences, netting, tree trunk guards.
 - Beneficial organisms, such as bats, birds, green lacewings, ladybugs, praying mantis, ground beetles, parasitic nematodes, trichogramma wasps, seed head weevils, and spiders that prey on detrimental pest species can be promoted.
- Follow all federal, state, and local laws and regulations governing the use, storage, and disposal of fertilizers and pesticides and training of applicators and pest control advisors.

- Use pesticides only if there is an actual pest problem (not on a regular preventative schedule).
- Do not use pesticides if rain is expected. Apply pesticides only when wind speeds are low (less than 5 mph).
- Do not mix or prepare pesticides for application near storm drains.
- Prepare the minimum amount of pesticide needed for the job and use the lowest rate that will effectively control the pest.
- Employ techniques to minimize off-target application (e.g. spray drift) of pesticides, including consideration of alternative application techniques.
- Fertilizers should be worked into the soil rather than dumped or broadcast onto the surface.
- Calibrate fertilizer and pesticide application equipment to avoid excessive application.
- Periodically test soils for determining proper fertilizer use.
- Sweep pavement and sidewalk if fertilizer is spilled on these surfaces before applying irrigation water.
- Purchase only the amount of pesticide that you can reasonably use in a given time period (month or year depending on the product).
- Triple rinse containers, and use rinse water as product. Dispose of unused pesticide as hazardous waste.
- Dispose of empty pesticide containers according to the instructions on the container label.

Inspection

- Inspect irrigation system periodically to ensure that the right amount of water is being applied and that excessive runoff is not occurring. Minimize excess watering, and repair leaks in the irrigation system as soon as they are observed.
- Inspect pesticide/fertilizer equipment and transportation vehicles daily.

Training

- Educate and train employees on use of pesticides and in pesticide application techniques to prevent pollution. Pesticide application must be under the supervision of a California qualified pesticide applicator.
- Train/encourage municipal maintenance crews to use IPM techniques for managing public green areas.
- Annually train employees within departments responsible for pesticide application on the appropriate portions of the agency's IPM Policy, SOPs, and BMPs, and the latest IPM techniques.

- Employees who are not authorized and trained to apply pesticides should be periodically (at least annually) informed that they cannot use over-the-counter pesticides in or around the workplace.
- Use a training log or similar method to document training.

Spill Response and Prevention

- Refer to SC-11, Spill Prevention, Control & Cleanup
- Have spill cleanup materials readily available and in a known location
- Cleanup spills immediately and use dry methods if possible.
- Properly dispose of spill cleanup material.

Other Considerations

- The Federal Pesticide, Fungicide, and Rodenticide Act and California Title 3, Division 6, Pesticides and Pest Control Operations place strict controls over pesticide application and handling and specify training, annual refresher, and testing requirements. The regulations generally cover: a list of approved pesticides and selected uses, updated regularly; general application information; equipment use and maintenance procedures; and record keeping. The California Department of Pesticide Regulations and the County Agricultural Commission coordinate and maintain the licensing and certification programs. All public agency employees who apply pesticides and herbicides in “agricultural use” areas such as parks, golf courses, rights-of-way and recreation areas should be properly certified in accordance with state regulations. Contracts for landscape maintenance should include similar requirements.
- All employees who handle pesticides should be familiar with the most recent material safety data sheet (MSDS) files.
- Municipalities do not have the authority to regulate the use of pesticides by school districts, however the California Healthy Schools Act of 2000 (AB 2260) has imposed requirements on California school districts regarding pesticide use in schools. Posting of notification prior to the application of pesticides is now required, and IPM is stated as the preferred approach to pest management in schools.

Requirements

Costs

Additional training of municipal employees will be required to address IPM techniques and BMPs. IPM methods will likely increase labor cost for pest control which may be offset by lower chemical costs.

Maintenance

Not applicable

Supplemental Information***Further Detail of the BMP******Waste Management***

Composting is one of the better disposal alternatives if locally available. Most municipalities either have or are planning yard waste composting facilities as a means of reducing the amount of waste going to the landfill. Lawn clippings from municipal maintenance programs as well as private sources would probably be compatible with most composting facilities

Contractors and Other Pesticide Users

Municipal agencies should develop and implement a process to ensure that any contractor employed to conduct pest control and pesticide application on municipal property engages in pest control methods consistent with the IPM Policy adopted by the agency. Specifically, municipalities should require contractors to follow the agency's IPM policy, SOPs, and BMPs; provide evidence to the agency of having received training on current IPM techniques when feasible; provide documentation of pesticide use on agency property to the agency in a timely manner.

References and Resources

King County Stormwater Pollution Control Manual. Best Management Practices for Businesses. 1995. King County Surface Water Management. July. On-line: <http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Los Angeles County Stormwater Quality Model Programs. Public Agency Activities http://ladpw.org/wmd/npdes/model_links.cfm

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Orange County Stormwater Program http://www.ocwatersheds.com/StormWater/swp_introduction.asp

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United States Environmental Protection Agency (USEPA). 2002. Pollution Prevention/Good Housekeeping for Municipal Operations Landscaping and Lawn Care. Office of Water. Office of Wastewater Management. On-line: http://www.epa.gov/npdes/menuofbmps/poll_8.htm

E.11. INF-3 Permeable Pavement (Pollutant Control)



Location: Kellogg Park, San Diego, California

MS4 Permit Category

Retention
Flow-thru Treatment Control

Manual Category

Infiltration
Flow-thru Treatment Control

Applicable Performance Standard

Pollutant Control
Flow Control

Primary Benefits

Volume Reduction
Peak Flow Attenuation

Description

Permeable pavement is pavement that allows for percolation through void spaces in the pavement surface into subsurface layers. The subsurface layers are designed to provide storage of storm water runoff so that outflows, primarily via infiltration into subgrade soils or release to the downstream conveyance system, can be at controlled rates. Varying levels of storm water treatment and flow control can be provided depending on the size of the permeable pavement system relative to its drainage area, the underlying infiltration rates, and the configuration of outflow controls. Pollutant control permeable pavement is designed to receive runoff from a larger tributary area than site design permeable pavement (see SD-6B). Pollutant control is provided via infiltration, filtration, sorption, sedimentation, and biodegradation processes. **Permeable pavements proposed as a retention or partial retention BMP should not have an impermeable liner.**

Typical permeable pavement components include, from top to bottom:

- Permeable surface layer
- Bedding layer for permeable surface
- Aggregate storage layer with optional underdrain(s)
- Optional final filter course layer over uncompacted existing subgrade

Appendix E: BMP Design Fact Sheets

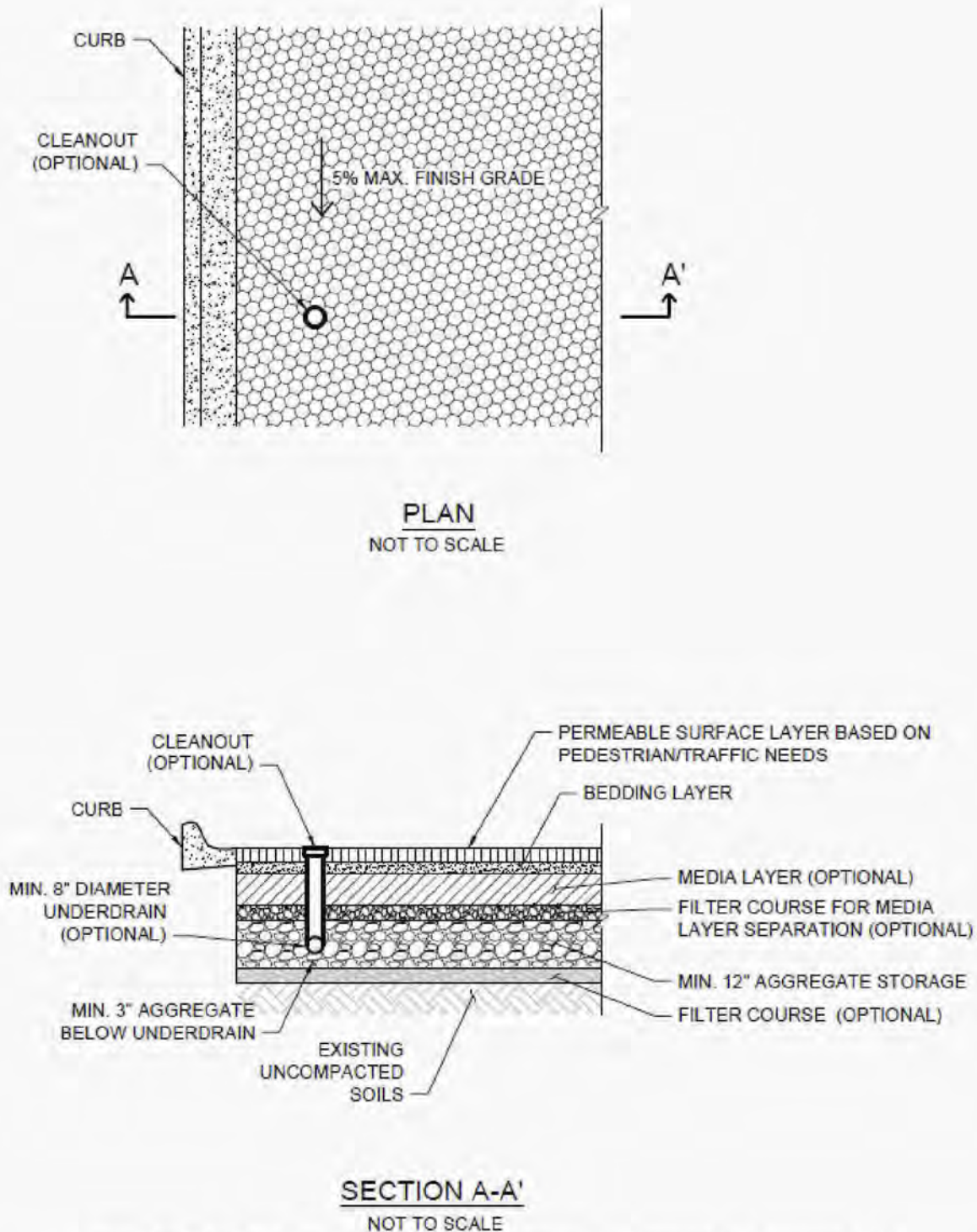


Figure E.11-E.11-1: Typical plan and Section view of a Permeable Pavement BMP

Subcategories of permeable pavement include modular paver units or paver blocks, pervious concrete, porous asphalt, and turf pavers. These subcategory variations differ in the material used for the permeable surface layer but have similar functions and characteristics below this layer.

Design Adaptations for Project Goals

Site design BMP to reduce impervious area and DCV. See site design option SD-6B.

Full infiltration BMP for storm water pollutant control. Permeable pavement without an underdrain and without impermeable liners can be used as a pollutant control BMP, designed to infiltrate runoff from direct rainfall as well as runoff from adjacent areas that are tributary to the pavement. The system must be designed with an infiltration storage volume (a function of the aggregate storage volume) equal to the full DCV and able to meet drawdown time limitations.

Partial infiltration BMP with flow-thru treatment for storm water pollutant control. Permeable pavement can be designed so that a portion of the DCV is infiltrated by providing an underdrain with infiltration storage below the underdrain invert. The infiltration storage depth should be determined by the volume that can be reliably infiltrated within drawdown time limitations. Water discharged through the underdrain is considered flow-thru treatment and is not considered biofiltration treatment. Storage provided above the underdrain invert is included in the flow-thru treatment volume.

Flow-thru treatment BMP for storm water pollutant control. The system may be lined and/or installed over impermeable native soils with an underdrain provided at the bottom to carry away filtered runoff. Water quality treatment is provided via unit treatment processes other than infiltration. This configuration is considered to provide flow-thru treatment, not biofiltration treatment. Significant aggregate storage provided above the underdrain invert can provide detention storage, which can be controlled via inclusion of an orifice in an outlet structure at the downstream end of the underdrain. **PDPs have the option to add saturated storage to the flow-thru configuration in order to reduce the DCV that the BMP is required to treat.** Saturated storage can be added to this design by including an upturned elbow installed at the downstream end of the underdrain or via an internal weir structure designed to maintain a specific water level elevation. The DCV can be reduced by the amount of saturated storage provided.

Integrated storm water flow control and pollutant control configuration. With any of the above configurations, the system can be designed to provide flow rate and duration control. This may include having a deeper aggregate storage layer that allows for significant detention storage above the underdrain, which can be further controlled via inclusion of an outlet structure at the downstream end of the underdrain.

Design Criteria and Considerations

Permeable pavements must meet the following design criteria. Deviations from the below criteria may be approved at the discretion of the City Engineer if it is determined to be appropriate:

Siting and Design	Intent/Rationale
☒ Placement observes geotechnical recommendations regarding potential hazards (e.g., slope stability, landslides, liquefaction zones) and setbacks (e.g., slopes, foundations, utilities).	Must not negatively impact existing site geotechnical concerns.
☒ Selection must be based on infiltration feasibility criteria. This is a "Standard Development Project" which is not subject to treatment control requirements. Proposed pavers will serve as a Site Design BMP. Treatment / Infiltration is not proposed.	Full or partial infiltration designs must be supported by drainage area feasibility findings.

Appendix E: BMP Design Fact Sheets

Siting and Design	Intent/Rationale
<p>☒ An impermeable liner or other hydraulic restriction layer is included if site constraints indicate that infiltration should not be allowed. <u>No impermeable liner is proposed. Proposed pavers will serve as a Site Design BMP.</u></p>	<p>Lining prevents storm water from impacting groundwater and/or sensitive environmental or geotechnical features. Incidental infiltration, when allowable, can aid in pollutant removal and groundwater recharge.</p>
<p>☒ Permeable pavement is not placed in an area with significant overhanging trees or other vegetation.</p>	<p>Leaves and organic debris can clog the pavement surface.</p>
<p>☒ For pollutant control permeable pavement, the ratio of the total drainage area (including the permeable pavement) to the permeable pavement should not exceed 4:1.</p>	<p>Higher ratios increase the potential for clogging but may be acceptable for relatively clean tributary areas.</p>
<p>☒ Finish grade of the permeable pavement has a slope $\leq 5\%$.</p>	<p>Flatter surfaces facilitate increased runoff capture.</p>
<p>☒ Minimum depth to groundwater and bedrock ≥ 10 ft.</p>	<p>A minimum separation facilitates infiltration and lessens the risk of negative groundwater impacts.</p>
<p>☒ Contributing tributary area includes effective sediment source control and/or pretreatment measures such as raised curbed or grass filter strips.</p>	<p>Sediment can clog the pavement surface.</p>
<p>☒ Direct discharges to permeable pavement are only from downspouts carrying “clean” roof runoff that are equipped with filters to remove gross solids.</p>	<p>Roof runoff typically carries less sediment than runoff from other impervious surfaces and is less likely to clog the pavement surface.</p>
Permeable Surface Layer	
<p>☒ Permeable surface layer type is appropriately chosen based on pavement use and expected vehicular loading.</p>	<p>Pavement may wear more quickly if not durable for expected loads or frequencies.</p>
<p>☒ Permeable surface layer type is appropriate for expected pedestrian traffic.</p>	<p>Expected demographic and accessibility needs (e.g., adults, children, seniors, runners, high-heeled shoes, wheelchairs, strollers, bikes) requires selection of appropriate surface layer type that will not impede pedestrian needs.</p>
Bedding Layer for Permeable Surface	

Siting and Design	Intent/Rationale
<p>☒ Bedding thickness and material is appropriate for the chosen permeable surface layer type.</p>	<p>Porous asphalt requires a 2- to 4-inch layer of asphalt and a 1- to 2-inch layer of choker course (single-sized crushed aggregate, one-half inch) to stabilize the surface.</p> <p>Pervious concrete also requires an aggregate course of clean gravel or crushed stone with a minimum amount of fines.</p> <p>Permeable Interlocking Concrete Paver requires 1 or 2 inches of sand or No. 8 aggregate to allow for leveling of the paver blocks.</p> <p>Similar to Permeable Interlocking Concrete Paver, plastic grid systems also require a 1- to 2-inch bedding course of either gravel or sand.</p> <p>For Permeable Interlocking Concrete Paver and plastic grid systems, if sand is used, a geotextile should be used between the sand course and the reservoir media to prevent the sand from migrating into the stone media.</p>
<p>☒ Aggregate used for bedding layer is washed prior to placement.</p>	<p>Washing aggregate will help eliminate fines that could clog the permeable pavement system aggregate storage layer void spaces or underdrain.</p>
Media Layer (Optional) –used between bedding layer and aggregate storage layer to provide pollutant treatment control	
<p>☒ The pollutant removal performance of the media layer is documented by the applicant. <u>No media layer is proposed. Project is a "SDP" which is not subject to treatment requirements.</u></p>	<p>Media used for BMP design should be shown via research or testing to be appropriate for expected pollutants of concern and flow rates.</p>
<p>☒ N/A A filter course is provided to separate the media layer from the aggregate storage layer.</p>	<p>Migration of media can cause clogging of the aggregate storage layer void spaces or underdrain.</p>
<p>☒ N/A If a filter course is used, calculations assessing suitability for particle migration prevention have been completed.</p>	<p>Gradation relationship between layers can evaluate factors (e.g., bridging, permeability, and uniformity) to determine if particle sizing is appropriate or if an intermediate layer is needed.</p>
<p>☒ N/A Consult permeable pavement manufacturer to verify that media layer provides required structural support.</p>	<p>Media must not compromise the structural integrity or intended uses of the permeable pavement surface.</p>
Aggregate Storage Layer	

Appendix E: BMP Design Fact Sheets

Siting and Design	Intent/Rationale
<input checked="" type="checkbox"/> Aggregate used for the aggregate storage layer is washed and free of fines.	Washing aggregate will help eliminate fines that could clog aggregate storage layer void spaces or underdrain.
<input checked="" type="checkbox"/> Minimum layer depth is 6 inches and for infiltration designs, the maximum depth is determined based on the infiltration storage volume that will infiltrate within a 36-hour drawdown time.	A minimum depth of aggregate provides structural stability for expected pavement loads.
Underdrain and Outflow Structures	
<input checked="" type="checkbox"/> <i>N/A</i> Underdrains and outflow structures, if used, are accessible for inspection and maintenance.	Maintenance will improve the performance and extend the life of the permeable pavement system.
<input checked="" type="checkbox"/> <i>N/A</i> Underdrain outlet elevation should be a minimum of 3 inches above the bottom elevation of the aggregate storage layer.	A minimal separation from subgrade or the liner lessens the risk of fines entering the underdrain and can improve hydraulic performance by allowing perforations to remain unblocked.
<input checked="" type="checkbox"/> <i>N/A</i> Minimum underdrain diameter is 8 inches.	Smaller diameter underdrains are prone to clogging.
<input checked="" type="checkbox"/> <i>N/A</i> Underdrains are made of slotted, PVC pipe conforming to ASTM D 3034 or equivalent or corrugated, HDPE pipe conforming to AASHTO 252M or equivalent.	Slotted underdrains provide greater intake capacity, clog resistant drainage, and reduced entrance velocity into the pipe, thereby reducing the chances of solids migration.
Filter Course (Optional)	
<input checked="" type="checkbox"/> Filter course is washed and free of fines.	Washing aggregate will help eliminate fines that could clog subgrade and impede infiltration.

Conceptual Design and Sizing Approach for Site Design

1. Determine the areas where permeable pavement can be used in the site design to replace traditional pavement to reduce the impervious area and DCV. These permeable pavement areas can be credited toward reducing runoff generated through representation in storm water calculations as pervious, not impervious, areas but are not credited for storm water pollutant control. These permeable pavement areas should be designed as self-retaining with the appropriate tributary area ratio identified in the design criteria.
2. Calculate the DCV per Appendix B, taking into account reduced runoff from self-retaining permeable pavement areas.

Conceptual Design and Sizing Approach for Storm Water Pollutant Control Only

To design permeable pavement for storm water pollutant control only (no flow control required), the following steps should be taken:

1. Verify that siting and design criteria have been met, including placement requirements, maximum finish grade slope, and the recommended tributary area ratio for non-self-retaining permeable pavement. If infiltration is infeasible, the permeable pavement can be designed as flow-thru treatment per the sizing worksheet. If infiltration is feasible, calculations should follow the remaining design steps.
2. Calculate the DCV per Appendix B based on expected site design runoff for tributary areas.
3. Use the sizing worksheet to determine if full or partial infiltration of the DCV is achievable based on the available infiltration storage volume calculated from the permeable pavement footprint, aggregate storage layer depth, and in-situ soil design infiltration rate for a maximum 36-hour drawdown time. The applicant has an option to use a different drawdown time up to 96 hours if the volume of the facility is adjusted using the percent capture method in Appendix B.4.2.
4. Where the DCV cannot be fully infiltrated based on the site or permeable pavement constraints, an underdrain must be incorporated above the infiltration storage to carry away runoff that exceeds the infiltration storage capacity.
5. The remaining DCV to be treated should be calculated for use in sizing downstream BMP(s).

Conceptual Design and Sizing Approach when Storm Water Flow Control is Applicable

Control of flow rates and/or durations will typically require significant aggregate storage volumes, and therefore the following steps should be taken prior to determination of storm water pollutant control design. Pre-development and allowable post-project flow rates and durations should be determined as discussed in Chapter 6 of the manual.

1. Verify that siting and design criteria have been met, including placement requirements, maximum finish grade slope, and the recommended tributary area ratio for non-self-retaining permeable pavement. Design for flow control can be achieved using various design configurations, but a flow-thru treatment design will typically require a greater aggregate storage layer volume than designs which allow for full or partial infiltration of the DCV.
2. Iteratively determine the area and aggregate storage layer depth required to provide infiltration and/or detention storage to reduce flow rates and durations to allowable limits. Flow rates and durations can be controlled from detention storage by altering outlet structure orifice size(s) and/or water control levels. Multi-level orifices can be used within an outlet structure to control the full range of flows.
3. If the permeable pavement system cannot fully provide the flow rate and duration control required by this manual, a downstream structure with sufficient storage volume such as an underground vault can be used to provide remaining controls.
4. After permeable pavement has been designed to meet flow control requirements, calculations must be completed to verify if storm water pollutant control requirements to treat the DCV have been met.

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